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THE RECENT FIRESTONE TIRE RECALL ACTION, FOCUSING ON THE ACTION AS IT PERTAINS TO RELEVANT FORD VEHICLES

HEARINGS

BEFORE THE

SUBCOMMITTEE ON TELECOMMUNICATIONS,
TRADE, AND CONSUMER PROTECTION

AND THE

SUBCOMMITTEE ON OVERSIGHT AND
INVESTIGATIONS

OF THE

COMMITTEE ON COMMERCE
HOUSE OF REPRESENTATIVES

ONE HUNDRED SIXTH CONGRESS

SECOND SESSION

SEPTEMBER 6 AND 21, 2000

Serial No. 106–165

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THE RECENT FIRESTONE TIRE RECALL ACTION, FOCUSING ON THE ACTION AS IT PERTAINS TO RELEVANT FORD VEHICLES

WEDNESDAY, SEPTEMBER 6, 2000

HOUSE OF REPRESENTATIVES,
COMMITTEE ON COMMERCE,
SUBCOMMITTEE ON TELECOMMUNICATIONS, TRADE,
AND CONSUMER PROTECTION, AND THE
SUBCOMMITTEE ON OVERSIGHT AND INVESTIGATIONS,
Washington, DC.

The subcommittees met, pursuant to notice, at 1:10 p.m., in room 2123, Rayburn House Office Building, Hon. W.J. "Billy" Tauzin (chairman, Subcommittee on Telecommunications, Trade, and Consumer Protection) presiding.

Members present Subcommittee on Telecommunications, Trade, and Consumer Protection: Representatives Tauzin, Oxley, Stearns, Largent, Rogan, Shimkus, Wilson, Pickering, Fossella, Blunt, Bliley, (ex officio), Markey, Gordon, Rush, Eshoo, Wynn, Luther, Sawyer, Green, McCarthy, and Dingell, (ex officio).

Members present Subcommittee on Oversight and Investigations: Representatives Upton, Barton, Burr, Bilbray, Ganske, Bryant, Bliley, (ex officio), Waxman, Stupak, Green, McCarthy, DeGette, and Dingell, (ex officio).

Staff Present: Tom DiLenge, majority counsel; Jan Faiks, majority counsel; Joe Greenman, legislative analyst; Anthony Habib, legislative clerk; Mark Paoletta, majority counsel; Charles Symington, majority counsel; Ann Washington, majority counsel; Edith Holleman, minority counsel; Brendan Kelsay, minority professional staff member; and Bruce Gwinn, minority professional staff member.

Mr. TAUZIN. The committee will please come to order.

I will ask all of our guests to please take seats. We are going to have a video demonstration to begin the hearing that will not have great sound quality, and we will ask all of our guests to take seats, please, and get real comfortable so that we might hear each other in the room.

Let me welcome all of you to this extraordinarily important hearing. Actually, a joint hearing of the Subcommittee on Telecommunications, Trade, and Consumer Protection and the Oversight and Investigations Subcommittee chaired by my good friend, Mr. Fred Upton. The two of us have asked our subcommittees to join with us in examining the important issue of the Firestone recall and the continuing saga of the many issues swirling about that problem.

Fred and I have agreed on a procedure that I hope will accommodate all of the members and will accommodate our witnesses. Let me outline the rules of today's hearing.

The chairman and ranking members of the committee and subcommittees will each have an opportunity to make 5-minute opening statements; and then, by agreement of the parties, we will then reserve 3 minutes for any member of the two committees in the order of seniority present here today when the gavel fell or upon their appearance at the committee meeting as they arrive.

Following the opening statements, we will begin introducing panels of witnesses. All witnesses will be sworn before the committee as this is an O&I subcommittee hearing and will give testimony under the oath of truthfulness.

The committee will, however, begin, before opening statements, with a demonstration of a video that I think is extraordinarily relevant and important to set the stage for this hearing. The video is a video prepared and done by a television station in Houston, Texas—would someone have the call letters for me, please—KHOU in Texas; and this video was done pursuant to an investigative report in February of this year. This video was the genesis of the original phone calls by consumers to NHTSA, which then prompted the preliminary investigation that led to the eventual decision to recall the Firestone tires in question. This video is of extreme importance, because it was, indeed, the catalyst for the recall that has, indeed, begun this year and for the investigation that continues both at NHTSA and at this committee and on the Senate side.

I will ask that everyone again be extremely quiet and comfortable, and I would ask the staff now to dim the lights and to run the video.

[Video shown.]

Mr. TAUZIN. The Chair recognizes himself for 5 minutes.

Ladies and gentlemen, we are in the midst, I think, of a national tragedy. Nearly 90 Americans have already lost their lives to accidents attributed to tires that are now subject to recall. Only about 1.75 million of those tires have actually been replaced. About 4.5 million of those tires are still being used in this country on vehicles that are traveling our highways. Just this weekend in California, a family who was on a 2-week waiting list to get replacement tires suffered an horrific accident as the tread separated from their Firestone tires and their vehicle had a terrible collision. In Texas, a young lad was killed this weekend again, and weekly we hear of more and more accidents and deaths and injuries on the highway attributed to these tires.

I think it is important for me to let you know, first of all, what our investigation has uncovered. What we have learned in this investigation leading up to this hearing is that beginning in 1992 when claims for bodily injury and damage began being instituted against Firestone, when those claims amounted to only 16 in 1992, those claims, nevertheless, began to escalate dramatically in 1995 and 1996. They went from 37 claims to 150 in 1997, to 294 claims in 1998, to 384 claims in 1999, to 772 claims, 172 have already been registered this year, for a total of 1,800 claims for accident or injury, resulting in nearly 90 deaths and many hundreds of severe injuries. Fourteen hundred plus of these claims are related to Ford Explorers and the same Firestone tires that have been subject to this recall.

What we have learned are some other interesting facts. For example, the 23575R15 tire, which amounted to only 6 percent of Firestone production of these tires, nevertheless were 36 percent of the total separations in 1 year alone in 1999.

Much has been made of the Decatur plant issue. Decatur produces 17 to 18 percent of the tires in question, and yet 57 percent of the total separations in the year 1999 came from the Decatur plant. The Decatur plant is not alone. Tires are separating made from other plants in other parts of this country.

We have also learned that this information was compiled and available to Firestone from the year 1992 through the current period and that none of this information was shared with NHTSA. Nor was it apparently requested by NHTSA from Firestone until the investigation began following the video you just saw and consumer complaints to NHTSA by telephone.

We have also learned some other interesting things. We have learned that in July 1998 a representative of the largest American auto insurer, State Farm Insurance, on his own volition sent an e-mail to NHTSA describing 21 incidents of failure of these tires, 14 involving Ford Explorers, and urging NHTSA to take action on the problem. Our investigators found the memo in a file at NHTSA. The memo went unanswered. NHTSA apparently did not respond.

In the year 1999, Mr. Boyden, who will later testify at this hearing, apparently also called the agency to update them on 10 more incidents that occurred in 1998 and again, on a second phone call, on 35 more incidents occurring in 1999. Again, the agency apparently did not respond nor take action pursuant to that information.

We have learned that in 1999 some very serious things were happening overseas regarding these tires or similar tires produced by Firestone and available on Ford Explorers. We learned, for example, that in 1998 Ford dealers in Saudi Arabia began complaining to Firestone about these tires and their failure rates in Saudi Arabia.

We have, for example, letters we are going to put into the record, one dated 1998, in which the gentleman from the Ford dealership is writing to the Firestone dealership, and I quote, “As you know, this concern goes back to mid-1997 when we first notified you of the concern. I have to state that I believe this situation to be a safety concern which could endanger both the vehicle and, more importantly, the user of the vehicle, so I am asking what is going on. Do we have to have a fatality before any action is taken on this subject?” 1998.

In 1999, Ford and Firestone, apparently in a dispute over who should be responsible for replacing the tires in Saudi Arabia, Ford assuming that responsibility, and we find a memo produced about discussions with Firestone legal authorities indicating, in effect, in that memo, and I quote, “Firestone Legal has some major reservations about the plan to notify consumers and offer them an option. First, they feel that the U.S. DOT”—the Department of Transportation—”will have to be notified of the program since the same product is sold in the United States”, evidence that there was a concern in 1999 that officials at DOT not know of the problem that was occurring in Saudi Arabia, which resulted in Ford replacing, I understand, 40,000 or more of these Firestone tires on their vehicles in Saudi Arabia.

We have also learned, and we hope to learn a lot more today, about the testing procedures on these tires. As you have all found from the press on the subject, Ford has recommended that these tires be inflated at 26 pounds per square inch on an Explorer, and there is great concern as to whether or not Firestone ever tested under speed conditions those tires on a Ford Explorer at 26 pounds per square inch. Firestone has not provided documents to our investigators indicating whether those tests occurred. Ford apparently has produced some documents indicating that their specs might have required that testing. We have yet to find out whether Firestone, and we will hear testimony today as to whether Ford, ever conducted testing at that inflation rate on these tires.

So we will learn a great deal today about who knew what and when. We will learn a great deal about why this recall is going so slowly and why people are still dying on the highways and why it took nearly 90 fatalities for us to get serious enough to expedite and get this recall going. We have to ask ourselves why we are in this mess and what we can do as a panel representing the Congress here to make sure this never happens again and that this recall be expedited so that fewer of our citizens lose their lives or be seriously injured on our highways.

I want to tell you quickly what this hearing is not designed to do. It is not a criminal investigation. It is not a legal case trying to affix liability or blame. We are here today to hear from the principals about their versions of the facts and to determine to the best of our ability what went wrong, what was known by what parties when, what was done and what was not done, and what could have been done to avert this national tragedy. From it, I hope that our committees will produce a body of evidence from which we and NHTSA and our Federal authorities and hopefully the companies can make the right decisions not only to get this awful tragedy behind us as quickly as possible but to make policy that will ensure that it never happens again.

The Chair yields back the balance of his time.

I am pleased now to welcome and recognize the ranking minority member from the great State of Massachusetts, my friend Mr. Markey, for an opening statement.

Mr. MARKEY. Thank you, Mr. Chairman, very much and thank you for holding this extremely timely hearing.

The hearing has been prompted by the recent announcement by Firestone that it would recall some 6.5 million tires used primarily on the Ford Explorer. Firestone was given the contract to produce specially designed tires for the Ford Explorer and began production in 1990 of such tires. Because of the boom in sales of the Ford Explorer over the ensuing years, Firestone produced large quantities of these tires, particularly the 15-inch tire. A subsequent rise in claims against Firestone, specifically instances where the tread and one steel belt separated from the other steel belt of the tire, began a number of years ago, especially when such data indicated to Firestone, to Ford, and the National Highway Transportation Safety

Administration that a public safety issue was at hand and that something needed to be done, is just one part of what this hearing will analyze.

There are, however, still many questions that need to be answered today. For example, the relationship between the tires themselves and the automobile for which they were designed, a sport utility vehicle, needs to be explored. NHTSA and consumer safety groups have already noted the proclivity of SUVs to roll over in certain situations, and NHTSA has proposed a rollover test and reporting requirement. Have SUVs put unanticipated stress upon those tires? In other words, if you could hypothetically take those tires off a Ford Explorer and instead put them on to a Ford Escort, would there still be a problem?

Now that the recall is under way, will consumers be able to replace their tires quickly? Knowing that it costs somewhere between $300 and $400 to buy new tires, a fairly significant sum for people on fixed incomes, will Firestone rapidly reimburse such consumers? Are there sufficient replacement tires in all markets to go around? Will there be prolonged delays and how can any such delays be dealt with?

After all, both tire companies and automobile manufacturers run the most compelling ads possible: A mother with a child in an automobile or an SUV on a rain-slick road at night, promising the consumer that if they buy that automobile, that SUV or that tire, that that mother and child will be safe in the automobile. That is the promise which these industries make to families, and there is nothing more heart wrenching than seeing the end of that commercial with the child and the mother safely able to make it home.

Well, here we know that there are scores and, ultimately, maybe hundreds of families that ultimately will not have that mother and child or father make it home. We have to know how quickly the industry is going to ensure that every one of these vehicles has a set of tires which can guarantee that that family can get home.

And another important question is whether NHTSA, whether the Federal agency itself has sufficient financial and personnel resources to fully gauge important safety issues as they materialize. In this instance, the agency maintains it did not have sufficient information to trigger an investigation sooner. Would additional staffing and funding for the safety agency earlier have helped that agency to notice a problem sooner and thus have saved lives? Once a hazard arises are, in fact, the resources there to ensure that the families of America are going to be protected?

The funding for this agency has been cut by fully one-third since 1980. Let's say that again. Despite the number of additional SUVs on the road, all of the additional automobiles over the last 20 years, the budget for the safety agency has been cut by one-third since 1980.

There is something fundamentally wrong, when every single family in the United States is on the road every single day, with the Federal Government cutting by one-third the budget for that safety agency. It is our responsibility this year to pass legislation which brings full funding to the safety agency so that it can guarantee that when any kind of evidence is made available that they don't have to put it aside because they don't have the full resources to follow up every single lead that could potentially jeopardize the safety of families in our country.

Thank you, Mr. Chairman. I yield back the balance of my time.

Mr. TAUZIN. The Chair is now pleased to recognize the full committee chairman, the gentleman from Richmond, Virginia, Mr. Bliley, for an opening statement.

Chairman BLILEY. Thank you, Mr. Chairman. Thank you for holding this hearing today, which is of extreme importance to the safety of the American driving public.

While we certainly will not get final answers today to many of the troubling questions surrounding this matter, we can at least begin the process of determining what we do know, what we do not know and, hopefully, what can be done by government and industry to help avoid a similar disaster in the future. No one seems to dispute that there is something terribly wrong with the large number of very similar and often serious accidents involving this particular Firestone tire, especially when mounted on a Ford Explorer. But even though the cause of this problem was and remains unknown, that is no excuse for inaction in the face of mounting evidence of real and potential danger to American drivers.

On this score, I believe all of the principal parties here today let the American public down. Indeed, it can be fairly said, if it were not for a local television report earlier this year that we just saw, this recent recall may never have happened. More than 2 years ago, one of our witnesses today from State Farm Insurance Company identified a suspicious and troubling trend in serious accidents involving the now recalled tire, mostly when mounted on the Ford Explorer. Yet when State Farm, on its own initiative, took the virtually unprecedented step of bringing these claims to the attention of NHTSA, the Federal Government's highway safety watchdog, that dog apparently was asleep. The data was thrown into a file, never to be looked at again, until the Firestone media storm broke earlier this year.

Despite the lack of response, State Farm persisted in monitoring this trend, which took a sharp upturn in the second half of 1998, then skyrocketed in 1999. On two more occasions in 1999, State Farm sought to spark interest in this growing trend at NHTSA, but despite the jump in claims, despite the severity of the accidents, despite the growing death toll, no one at NHTSA reacted until a Houston television report on these allegations in February of this year prompted NHTSA to open an investigation in May which, in turn, prompted the recall action by Firestone.

NHTSA's attempts to justify the lack of earlier action ring hollow. Transportation Secretary Slater, when recently confronted by the media about the State Farm warnings and its own data base of dozens of similar claims, responded that the total number of claims were small and did not involve any fatalities. I am sure that the American people are glad to know that our safety agency waits until someone dies before launching an investigation into defective products. But, as the committee uncovered from NHTSA's own files, the original State Farm referrals to NHTSA did include two fatalities. So not only were Secretary Slater's comments insensitive, they were simply wrong as well.

Then there is Firestone, which bears primary responsibility in this matter. Its data base of personal injury and property damage claims involving this tire is numbered in the thousands. While a significant number of claims on such a widely used tire is to be expected, Firestone said that it never even bothered to analyze this data for unusual trends until this summer after NHTSA asked for it. Within a matter of days, this analysis, spearheaded more by Ford than Firestone, revealed the shocking facts that lead to the recent recall.

Sadly, we can count the number of lives that probably could have been saved had this analysis been done even just 2 years ago. Indeed, contrary to Firestone's assertions, there is evidence that Firestone was analyzing such data much earlier than July of this year.

Ford Motor Company also is not blameless in this matter. Far and away, the Ford Explorer is the most popular sport utility vehicle in the United States, carrying millions of American families to and from work, day care, school and on vacation. Yet, Ford, too, when faced with hundreds of complaints of major tire defects on the Explorer, failed to respond with a sense of urgency that one would expect when the safety of so many people rested on its shoulders. These warnings also include the dozens of Ford Explorer accidents and deaths in foreign countries allegedly resulting from similar tire failures between 1997 and 1999, forcing Ford to begin recalling the same or similar tires abroad 1 year ago.

None of this should obscure the overall excellent safety record that both Ford and Firestone have amassed during their century of service to the American people. But black marks like this episode can actually end up serving the people's interest if they force everyone to redouble our efforts to improve the safety and increase the safety margin of these inherently dangerous, but necessary, products.

I also hope that this sad chapter in American history may prompt increased sharing of information among all parties represented here today—government, car and tire makers, and the insurance industry. I am confident that had everyone known the information that each individual party to this affair had in its possession this recall would have occurred far sooner and with far fewer loss of lives.

Thank you, Mr. Chairman.

Mr. TAUZIN. Will the gentleman yield?

Chairman. BLILEY. Yes.

Mr. TAUZIN. I thank the gentleman.

I simply wanted to put one fact into the record following my friend from Massachusetts' statement on funding. We will offer later on into the record a document indicating that the Defects Investigation Contract Program, which is the program within NHTSA that does defects investigation, actually saw a 50 percent increase in funding over the time period cited by my friend from Massachusetts—actually, a 50 percent increase from the year 1980 for this current year.

I thank the gentleman.

The Chair will now recognize the gentleman from Michigan, the ranking minority member of the full Commerce Committee, Mr. Dingell, for an opening statement.

Mr. DINGELL. Mr. Chairman, I want to thank and commend you and Chairman Upton for holding this hearing. This is precisely the kind of matter which the Congress should be looking into. We must gather and understand all of the facts so that we can assess properly the behavior of all parties to determine whether new legislation and/or improved regulation is needed. Our basic purpose here is to see to it that the consuming public and the motoring public is fully protected.

The recall of 14.4 million tires by Bridgestone/Firestone since August 9 is the second largest tire recall ever. It is surpassed only by Firestone's recall of 14.5 million tires in 1978. The recall in 1978 led to hearings where this committee disclosed many of the same problems that are involved with the recall today. Then, like now, tread belt separations on Firestone tires were involved in accidents causing serious injury and deaths. Then, like now, many of Firestone's problems related to its plant in Decatur, Illinois.

The recent recall came about only after Ford Motor Company, whose vehicles were equipped with many of the tires, was given access to Firestone's claims data in late July and was able to link 46 deaths and a large number of claims to accidents involving three 15-inch models of Firestone tires—the ATX, ATX II and the Wilderness AT. Since August 9, the number of fatalities attributed to these tires has grown to 88, according to the National Highway Traffic Safety Administration. Time, then, is of the essence. I do note that, after my letter of August 11, Firestone agreed to speed up its recall by reimbursing consumers to replace their tires with those of a competitor.

More is riding on this hearing, however, than the reputations of Firestone and Ford. Countless Americans are on the road today, picking up their kids, driving to work, and the last thing that should worry them is the quality and the soundness of their tires. It is unconscionable that so many have been placed in this kind of situation.

Today, almost 1 full month after the recall was announced, neither Firestone or NHTSA, the government agency responsible for tire safety, has been able to identify why these tires are failing and why serious accidents are occurring. Consumers, therefore, have justifiably expressed a great deal of concern for their safety and for that of their loved ones, as well as a lot of frustration about the way this story has unfolded.

Every day there seems to be some new disclosure, fostering apprehension that Firestone may not yet have control of the problem. The concern was compounded by a recent full-page ad placed by Firestone in major newspapers around the country assuring consumers that it acted appropriately but acknowledging that it does not know what is causing the tires to fail. In order to restore public confidence, Firestone must identify the root cause of its tire failure problem quickly and fully disclose their findings.

Consumers can also take little comfort from Firestone's explanation of why it took so long to identify the Firestone failure problem. According to Firestone, the problem eluded them because tire manufacturers never properly analyzed data and personal injury claims to identify defects or problems with tires. They said the universe of claims data is simply too small to analyze. But a staff examination of the records revealed that, since 1995, Firestone had reports on more than 1,600 lawsuits, property claims and personal injury claims involving their recalled tires. I must say, I find it curious that Firestone did not regard 1,600 claims as significant, when it took only 21 claims for State Farm Insurance Company to decide that a potential problem existed.

Records available to the committee also indicate that some at Firestone, in apparent contradiction to its statements to committee staff and others, analyzed their claims data for 1998. These Firestone analyses showed that the claims were especially high for ATX tires and that the claims were highest for tires produced at the Decatur, Illinois, plant. And contrary to Firestone's other assertion, at least one other American tire company, Goodyear, says it routinely looks at all of its customer data, including claims data, to identify defect or failure trends with its tires.

Whatever else we learn at the hearing today, I hope that all involved will see the need for more open and detailed communication regarding these critical products, and how they perform in the field. If it is industry practice not to share claims with automakers, then it is time for that practice to change, by statute or otherwise. Had the Houston television station not run the story that we have seen today, perhaps we would still not know about these matters.

As for NHTSA, we need to know that its resources are adequate so that it can effectively perform its important safety work. If budget cuts and other restrictions placed on that agency prevent it from protecting the public, then this committee should seriously look at increasing the budget and freeing the agency from constraints. It is also entirely appropriate at a time like this to evaluate whether NHTSA statutory authority is sufficient, and I trust we will hear about this as we go forward.

Again, Mr. Chairman, I thank you and Chairman Upton for holding this hearing, and I look forward to the testimony of the witnesses.

Mr. TAUZIN. I thank the gentleman.

It is now indeed my pleasure to welcome the young gentleman from Michigan, the chairman of the Oversight and Investigations Subcommittee of our Commerce Committee, Fred Upton.

Mr. Upton.

Mr. UPTON. Thank you, Mr. Chairman. Good afternoon, everyone.

Made in the USA means something to most Americans. It means the highest quality product made by the highest quality work force in the world. People who buy an American product demand and rightly deserve the best and indeed the safest.

Today's hearing is very personal to me, because I come from Michigan, the auto State, the auto capital of the world. Michiganders are ingrained with a special pride about the auto industry and its proud industrial tradition which has been a linchpin of our Nation's economy since the early 1800's. When the integrity of one of our cars is called into question, we in Michigan have a burning interest in getting to the bottom of it and fixing it to reassure the American people and the rest of the world what they have known for over a century, that cars from the auto State are the best in the world.

Tragically, some 88 people have died in accidents involving Firestone tires. Our prayers are with those families today.

We have convened this important hearing today to get to the bottom of what is wrong with the Firestone tires and what we need to do to fix them so that no family will have to endure the same pain as those who have already lost a loved one. We need to know why NHTSA, which has officials who are paid to do nothing else but monitor accidents, has been asleep at the wheel when it had information served up to it on a silver platter by State Farm Insurance Company which would suggest grave problems with Firestone tires. The taxpayers demand better.

Our committee's investigators have gone to corporate headquarters of Firestone in Nashville, Ford in Dearborn, and NHTSA headquarters here in Washington to investigate the matter, combing literally thousands of documents, examining reams of data, and interviewing dozens and dozens of officials to try and shed some light on these questions. Under that information, it is our job today, this afternoon, to ask tough questions of the witnesses to further illuminate what can be gleaned from the information with hopes of what we do here today can help save lives tomorrow.

I would like to note that I am not happy to learn that Secretary Slater apparently has refused to participate in this hearing today, despite him being just down the street. As Secretary of Transportation, it is his responsibility to oversee NHTSA's role in the life and safety for Americans traveling on America's highways. This is the people's business, and if he can be with Cokie Roberts on the Sunday talk shows, he certainly ought to be here before Republicans and Democrats searching for the truth on a workday.

I want to thank Chairman Tauzin for his efforts in holding this joint subcommittee today and Chairman Bliley as well. I look forward to the testimony of our witnesses and the answers to our questions, and I yield back the balance of my time.

Mr. TAUZIN. Thank you very much.

The Chair now yields to the designated minority representative of the Oversight and Investigations Subcommittee, the gentleman from Michigan, Mr. Stupak.

Mr. STUPAK. Thank you, Mr. Chairman. Thank you for holding this very important hearing. I hope it is the first of several to look into the tire safety issue.

Twenty-two years ago, this committee held 4 days of hearings on the first incident of tread belt separation in radial tires. The tire was the Firestone 500, a radial developed for passenger vehicles. Although the 500 had a very high rate of failure at the time of the hearings, there were 15 deaths and 16 injuries; ultimately, 41 deaths resulted.

In contrast, there are already 88 fatalities attributed to the tread belt situation in the Firestone ATX series of tires we are looking at today, and the number continues to grow. The reason: This tire was placed on a sport utility vehicle, a vehicle which has a tendency to roll over when a tire fails. The tire failure is one of the top three most serious vehicle safety defects we have ever seen in this country. It is surpassed only by the deaths and injuries that resulted from the Ford Pinto remounted gas tank and the GMC pickup externally mounted gas tank. Unfortunately, many things have not changed since 1978.

Firestone, then as now, has found no manufacturing or design defect, but blames the consumer for every single failure. Firestone alleges that consumers drive too fast, underinflate their tires, drive in hot climates, overload the vehicle, and don't do proper maintenance. Then, as now, Firestone Decatur plant showed up as a source of an unusual amount of failing tires. Then, as now, Firestone cannot explain why other brands of tires do not have the same failure rate. Then, as now, the National Highway Transportation Safety Administration, NHTSA, standards for tire strength were and are grossly inadequate. In fact, they have not changed those standards since 1968, long before there were steel-belted radials and the popular sport utility vehicles.

There are a few new wrinkles. This time, the tires are found mainly on one company's vehicle, the Ford Explorer SUV and light trucks. Firestone has two new factors to blame: hot climates, which stresses its tires, and high ozone, which degrades its tires. The other change is that Ford, until recently, had agreed with Firestone that there was nothing wrong with the tires. Ford made these statements despite receiving more and more complaints from their dealers who were wondering why only Firestone tires failed.

Mr. Chairman, we are going to hear a lot today about how Firestone did not know there was a problem, Ford did not know there was a problem, NHTSA did not know, until a Houston television station told them there was. The documents the committee has received, along with the news reports, indicate that all these parties knew a great deal more in 1998 and in 1999 about tire failures than the Houston television station did. They just ignored it.

We also are going to hear from a number of witnesses that the number of failures were so small that no one could have been expected to pay attention. Yes, the numbers began small, but because of the propensity of the SUVs to roll over when a tire fails, the cost in deaths and injuries was inordinately high and increasing at an alarming rate. Both Ford and Firestone should have known and should have watched this particular vehicle more closely. With less than 6,000 vehicles in the entire country of Saudi Arabia, there were 18 accidents in Saudi Arabia, including 7 fatalities in 1999. The U.S. had 4, and there was another large group in Venezuela. Despite what everyone says about the conditions in all of these countries, one fact remained: Other tires under the same conditions did not fail. That should have alerted everyone. It alerted the State Farm Insurance Company, it alerted the Center for Auto Safety. Unfortunately, Ford, Firestone, and NHTSA failed to act.

Mr. Chairman, we cannot depend on Ford and Firestone to tell us what happened. American consumers are tired of hearing Firestone blame its customers for the problems found in their tires. American consumers are tired of hearing Ford blame Firestone. Consumers do not go out and buy Ford tires and ask the dealer to throw in a vehicle. They buy a vehicle and the tires are part of that vehicle.

Today I am going to ask Firestone and Ford to join with me in calling for and cooperating with an independent review of these tire failures worldwide to determine the cause of the failure and to propose solutions and report back to this committee and the public by the end of the year. In the meantime, I believe the recall should be widened to include all 15- and 16-inch Firestone tires, as has been done in Venezuela and Saudi Arabia.

We here in the United States deserve to be treated no differently than people in other parts of the world. We deserve an answer to the many questions that will be raised here today. I am afraid that Firestone, Ford and NHTSA can't find the answers. Let's join together to call for and support a fully independent review of this situation so that we can find the answers. The public deserves an answer. This committee deserves an answer, and most of all, the families of the 88 people who have lost their lives deserve an answer.

With that, Mr. Chairman, I yield back the balance of my time.

Mr. TAUZIN. I thank the gentleman.

The Chair is pleased now to welcome the vice chairman of the Telecommunications, Trade and Consumer Protection Subcommittee, the gentleman from Ohio, Mr. Oxley, for an opening statement.

Mr. OXLEY. Thank you, Mr. Chairman.

We are here for a hearing on the most serious of issues: highway safety. Every day, drivers rely on their vehicles and tires to carry them to destinations a mile or hundreds of miles away. They want to get where they are going and back safely. The encouraging fact is that fatality rates have fallen in relation to vehicle miles traveled.

Today we confront something out of the ordinary, which is an unfortunately high number of accidents, some of them tragically fatal, principally involving Ford Explorers and Firestone tires. It is the job of the two subcommittees here today to make sure the drivers and their families feel secure. My hope is that the Commerce Committee will be able to look at the Firestone recall situation in the detail it deserves.

What caused these accidents? Was there a trend that could have been identified much earlier? What needs to be done in response? There will be questions about engineering, product quality, and data review today. A full view of highway safety should eventually take driving behavior into account as well. The challenge for these subcommittees is to dig beneath the headlines of the last month and the events of the past few years, because if the answer is too easy, the question probably wasn't good enough.

I extend a welcome to our witnesses, and I particularly note the presence of Ford president Jacques Nasser, and the CEO of Bridgestone/Firestone, Mr. Ono. You can't write the history of the automotive industry without the names of Ford and Firestone, and the advances from the Model T to the cars of the new millennium that they have been part of.

The first thing that I am looking for is assurance that every driver is being protected. Suspect tires must be replaced now.

Tire manufacturers are boosting production to help fill the current shortfall, and the exchange terms for consumers should be hassle free. The replacement program must also be fair nationwide. Vehicle owners in States with relatively low accident rates like Ohio have the same right to new tires as people who live in States with more incidents.

Experts are already at work trying to determine what caused the problem and whether it is a single cause or many. Why, is one question. When, is another. Why weren't any tread defects detected earlier? I find it remarkable that NHTSA did not follow up on findings made by the Nation's largest auto insurer, State Farm, all the way back in 1998.

Recalls of this magnitude inevitably prompt a review of regulations and practices. I suspect that there will be heightened cooperation within the automotive and tire industries from now on. The regulatory question to ask is whether agency resources have been put in the right place and whether regulators are focusing their attention on the most important issues. We should also resolve to do the most good for the consumer by putting agendas aside and responding on the basis of the facts as they emerge.

I was disturbed to find a Web site called "The Firestone Tire Recall Legal Information Center," which seemed to be more devoted to finding cases for trial lawyers than providing assistance to consumers.

There will be some hard questioning today, and properly so. The Commerce Committee has a long tradition of oversight in the public interest. We must put safety first. I look forward to our witnesses and the questioning that will follow, and I yield back.

Mr. TAUZIN. The Chair thanks the gentleman.

And the Chair now yields to the gentleman from Tennessee, Mr. Gordon, for an opening statement.

Mr. GORDON. Let me first give my thanks to Chairmen Tauzin and Upton, and Ranking Members Markey and Stupak for holding this very timely hearing. I also want to extend my welcome to our witnesses today. Following up on Mr. Oxley's remarks, I want to also welcome Dr. Sue Bailey who has a very short tenure at her agency, yet brings outstanding credentials and a good reputation from the Department of Defense as Under Secretary there at the Pentagon.

I suspect that all of our witnesses would rather be doing something somewhere else today. But this is an important hearing; the American public deserves to know more about what is going on, and so I thank you for being here.

Let me also say that I suspect that a lot of the time today is going to be spent trying to place blame and deflect blame. I want to take a little different tack. I am more interested in, rather than learning about the unfortunate deaths and injuries in the past, I want to be able to save lives and injuries in the future. So I am going to be asking you about the QS 9000 quality assurance program, whether you are satisfied with it, and whether you think the status quo is adequate or there should be some changes. And if you are satisfied with it, then I guess we need to learn more about that program, and if you are not, what changes should be made. Should that be an industry change with I guess potentially judicial oversight, as you all are very concerned about now, or should it be a—is there a role for Congress or the administration in implementing some of that change?

Those are going to be some of my questions. I am going to ask everybody the same thing, so you will know what is coming. You have 5 minutes, so it is sort of easy to rope a dope here, but I would like to try to get some answers and move forward. Thank you.

Mr. TAUZIN. I thank the gentleman.

The Chair now recognizes the gentleman, Mr. Ganske, for an opening statement.

Mr. GANSKE. Thank you, Mr. Chairman. I was walking down the street yesterday in Des Moines and I ran into a Ford dealer. I asked him how this was impacting his business, and he said that he had set aside four employees full-time to replace tires. They had replaced 400 tires, and if they had sufficient tires, they would have replaced double them. He saw that there might be a shortage in September for getting those tires replaced. It affects dealerships and people all across this country, not to mention the fears that people have for the safety of their automobiles.

I have two questions that I want to ask all of the people today. First I want to know from NHTSA, Bridgestone, Firestone and Ford what they are doing to ensure that we get an impartial determination of the cause of the increased failure rates at the Decatur plant. It seems that there isn't controversy on the fact that there has been a disproportionate share of failed tires from the Decatur plant that were manufactured at the time of the strike. Data that is provided in the testimony today from Ford shows a tread separation claims rate for Firestone 15-inch and 16-inch tires from 1995 to 1999 with about a 14 times higher incident rate—this is claims rate—at the Decatur plant for the ATX than other plants, and about the same, 14 times higher rate for the Wilderness AT at the Decatur plant, in comparison to other plants.

Then, data from a chart that was provided by Mr. Ono from Bridgestone/Firestone shows essentially the same thing. Claims per million tires produced for the ATX shows at least a twice higher rate for the Decatur plant than the next rate from the Wilson plant. The same thing goes for the Wilderness AT.

So my second question that I want to ask and get on the record from Mr. Ono and Mr. Nasser is: Do they think there is a causal relationship between the Decatur plant strike and the tire failures? I hope that at some time in the future, we are able to get employees and managers from the Decatur plant here to testify. With that, I yield back.

Mr. TAUZIN. The Chair thanks the gentleman.

I yield now to the gentleman from Ohio, Mr. Sawyer.

Mr. SAWYER. Thank you, Mr. Chairman. Thank you for this hearing. I think it is probably fair to say that coming from Akron, Ohio, there is no member here who has felt the stress and the burden of the issue that brings us all here today. In the course of the last century, Akron, Ohio has built millions of tires. They have gone out across the country and around the world, and spread an industry that has been transnational in its organization and global in its reach, for longer than those terms have been used in their current context.

It is a matter of personal concern to people in Akron, Ohio that the lives of consumers be the first priority, and that the deaths of 88 people and injuries to at least 254 were linked to tread separation on tires, whether they have been built in Akron, Ohio or not. We have not built a tire in Akron, a passenger car tire in Akron in 28 years. But it remains a center point of research and development, technology and command and control in this global industry, and the topic that brings us here today is of importance to all of us.

Industry can't build a perfect tire, and in the early days of the last century, Model T's carried as many as four tires. In the 1940's and 1950's, some cars still carried as many as two. And today, cars typically carry one. But the point remains that the only backup piece of equipment that comes on a car is a spare tire. It is not by accident. Tires are complex products. They may all look pretty much the same, but they are not a commodity. They are highly engineered products that operate in one of the most extraordinarily violent environments of any product that we expect to use in our ordinary daily lives. A modern car develops hundreds of horsepower, hundreds of pound feet of torque; it develops extraordinary cornering power; its steering capacity is unsurpassed in the history of the automobile, and modern braking systems provide enormous stress on a car in bringing thousands of pounds to a halt rapidly.

All of those forces express themselves through four small contact patches the size of a man's hand, of a continuously rotating tire, and the expectations that we have of fail-safe performance from those four contact patches is an extraordinary thing. The fact that they perform as well as they do, 700 revolutions per mile, mile after mile, for 50,000 miles and beyond, most frequently without failure, is extraordinary. Those are expectations that we have, and in large part, unless they are abused or damaged, tires function in that way.

What is most troubling about the matter that brings us together today is that the extremely small failure rate in itself may have exacerbated the process of finding that there was a problem and trying to identify its source and, more importantly, as a number of members have mentioned, its cause.

I have a longer statement that I am not going to go into right now. I hope to bring out some of the points in questions and answers. But just let me add in closing that the tire industry has been working on updating tire safety regulation worldwide through a complex multiyear process. The current regulations that make up the Federal Motor Vehicle Safety Standards, Section 109, were written in the mid-1960's, when bias belt tires still dominated the market. So it comes as no surprise to me today that we are likely to be talking about bringing tire regulation firmly into the 21st century.

I know that the industry and regulators have been working to develop a harmonized standard for tires based on the best global tire safety practices. In doing so, the industry has asked for thoughtful contributions of key public interest and consumer protection groups here in the U.S. and around the world. I hope that this work will continue and that we will set a standard for that here today with the new perspective that today's hearings bring.

Several questions have been raised that address this tire recall here today. I look forward to hearing from today's witnesses, and simply say in conclusion, that in the course of the time in which we have worked to look into the root cause analysis, I can tell you that there is no one working on this in my district in Akron, Ohio who is going to sleep well until the cause is found.

Thank you, Mr. Chairman. I appreciate your flexibility.

[The prepared statement of Hon. Tom Sawyer follows:]

PREPARED STATEMENT OF HON. TOM SAWYER, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF OHIO

In the course of the last century, Akron, Ohio, has built millions of tires. They have gone out across the country and around the world and spread an industry that has become transnational in its organization and global in its reach for longer than those words have been used in this context.

It is a matter of personal concern throughout Akron that lives of consumers be the first priority and there is deep concern over the 88 deaths linked to these tires even though they were not built there. Although passenger tires have not been built in Akron for more than 20 years, Akron remains the center point in research and development, technology, and command and control for this global industry. We care deeply about safety.

However, we also recognize that industry cannot build a perfect tire. In the early part of the last century, in the days of the Model T, cars carried as many as four spare tires. In the 1950's, there were cars carrying two spares. Today, cars typically carry only one. But the point remains: the only back-up piece of equipment that comes on a car is a spare tire, and it is there on purpose.

Tires are complex products. Although they may look the same, they are not a commodity. They are a highly engineered product operating in one of the most extraordinarily violent environments of any consumer product we use in our ordinary daily lives. Modern cars develop 100's of horsepower, 100's of pound-feet of torque, they possess extraordinary cornering power and a steering capacity unsurpassed in the history of the automobile, as well as modern braking systems designed to bring thousands of pounds to halt rapidly. All these forces express themselves through four patches, each the size of a human hand. The expectations consumers have of fail-safe performance—most often met—is in itself an extraordinary thing. That tires perform 700 revolutions per mile, mile after mile to 50,000 miles and beyond with such low rates of failure is extraordinary as well.

In fact, what is most troubling about the Firestone ATX and Wilderness tires case is that their extremely small failure rate itself exacerbated the process of finding that there was a problem and trying to identify its source. And this raises important issues about how we track these troubling accidents.

What we can expect is that when a problem occurs, it is identified, its cause is established, and consumers are adequately protected. By voluntarily recalling millions of the ATX and Wilderness AT tires, Bridgestone/Firestone and Ford are taking steps to do this. Both companies are working to figure out what is causing the tire tread separation. After three weeks into the root cause analysis, there are no answers, but I can tell you with only a little overstatement that no one in working on this in my district in Akron, Ohio, is going to sleep until the cause is found.

I would also like to add that the tire industry has been working on updating tire safety regulation worldwide through a complex, multi-year process. The current regulations that make up the Federal Motor Vehicle Safety Standards (FMVSS) Section 109 were written in the mid1960s, when bias tires still dominated the market. So it comes as no surprise to me today that we are likely to be talking about bringing tire regulation firmly into the 21st century.

I know that the industry and regulators have been working to develop a harmonized standard for tires based on the best global tire safety practices. In doing so, the industry has asked for the thoughtful contributions of key public interest and consumer protection groups here in the U.S. I hope that this work will continue, but with a new perspective that today's issue brings.

Several questions have been raised that address this voluntary tire recall. I look forward to hearing from today's witnesses to learn how we can do better and just how much better we can do when it comes to measuring consumer protection.

Mr. TAUZIN. The Chair now recognizes the gentleman from California, Mr. Bilbray, for an opening statement.

Mr. BILBRAY. Thank you, Mr. Chairman. Mr. Chairman, I would like to thank the gentleman from Akron, Ohio for his in-depth report on the status of where the rubber meets the road. I would have to sort of agree with him that I guess we take so much for granted in the American social structure. The fact is, as my colleague next to me just pointed out, that you hardly know what a flat tire is now unless something hits your sidewall, with the introduction of steel-belted tires.

I understand that there are members here who have community economic interest about this issue and the credibility. I mean, I think that the gentleman from Michigan can point out that the reliability we have in the automobile industry is one thing that I think that our grandfathers could only dream up and our grandmothers could only cringe at. I guess if my father was alive today, he would be attacking me at why my wife drove across country in a car without her husband with her. You know, you can't allow a woman to go drive all the way across the country because it wasn't safe and it was terrible and look at all the things that could have happened. I think it is just a testimony to the dependability of our transportation system in this country in a lot of ways. Granted, my wife got to see more of El Paso than they preferred to for a few days, but that is another story.

Mr. Chairman, I would just like to speak from the San Diego point of view, seeing everybody is talking about their little hunk of this issue in their part of the world. As we talk about the industry, as we talk about the automobile industry, the tire industry, the people that build these cars and make these tires, I think we have to remember too that this issue affects everyone in the entire country. It is something that goes beyond the people who produce the products; it goes and ends up with those who receive the products and pay good money for these products and expect them to perform to a reasonable standard.

I would have to tell you that I have a consumer who is a lady who drove this summer, as those of us in the West will do, thousands of miles on their vacation, from San Diego, by the Mexican border, all the way up to northern Idaho with her family, with a fully loaded Explorer; ended up getting back, even though it was during the heat of the summer, a very hot summer this year, unloaded the car, unloaded the family, and the next trip just happened to be off to the office, and the tire became unlaminated and fell apart, and her comment was, Thank God this didn't happen at 70 miles an hour with a fully loaded car. It just happened at a certain time, it was the safest time to happen.

I only want to say that because I think we always talk about the deaths and the terrible things that happen when these things fail. We were lucky in this one case that my constituent was able to talk about it now, rather than having her family read about her accident in the paper.

I would just ask us to get back to this issue of the fact that there were indications of a problem—we have a problem that crosses over two major industries that have major, major impacts on some communities in this country, and have influence in all of the communities in this country, and that is between the automobile industry and the tire manufacturing industry. I think that we need to say, where was the breakdown in communication? Not just where blame rests and when and where and who could have avoided this problem, but also how do we avoid it in the future and how do we straighten this out to make sure that when a woman wants to drive her family on a vacation or a husband wants to send his wife off on a trip, a long-distance trip in her car, one of the things we don't have to worry about is a faulty tire that falls apart at high speed and causes a terrible accident. I think that is our challenge.

Our challenge is not to protect an industry, not to cover our employees and employers' tails at this time; it is to make sure that not only do people have a job to go to, but they also have a safe car to drive home in. I would ask us to consider that as Democrats and Republicans but, most importantly, as Americans today. I yield back, Mr. Chairman.

Mr. TAUZIN. I thank my friend.

The Chair now yields to the gentleman from Texas, Mr. Green, for an opening statement.

Mr. GREEN. Thank you, Mr. Chairman. I would like to thank you and Chairman Upton for calling this joint hearing of both the Telecom and Oversight Subcommittees.

I appreciate the recognition of this serious safety issue that will address and make certain that the lives of American consumers is not at risk as they drive their children to school, themselves to work or take a family vacation, as my colleague from California mentioned. I would also like to congratulate Channel 11, KHOU, in Houston for their efforts into the loss of the life of a competing station's TV reporter in a tire separation accident that occurred over 2 years ago. And I would also like to recognize my Texas colleague from south Texas where just recently there was a death of a 13-year-old child in Texas in a rollover incident with a Firestone tire that blew out. We need to personalize this because I know in manufacturing oftentimes we produce a product and sometimes forget that product is so important, whether it is in my earlier business as a printer producing a product or someone producing tires for automobiles or in my district where we produce petrochemicals. We need to realize the impact that it can have, even a small percentage failure, on our ultimate customers.

We are going to hear from a lot of witnesses today and particularly the National Highway Traffic Safety Administration, NHTSA, and I want to welcome all of the witnesses here. It is important to find what Bridgestone/Firestone and Ford knew when they noticed potential defects in the manufacture operation of these tires.

Additionally, we need to closely examine the role that NHTSA played in these events and whether or not we may be asking that agency whose budget has been cut approximately one-third over the last decade to do more with fewer resources. It was noted earlier that the NHTSA section that is responsible for tire safety received a 50 percent increase since 1980, but that is 20 years and not adjusted for inflation. When you realize that we have 41 percent more vehicles on the road today, we consider that a cut.

Just as importantly, we need to live up to the name of one of our subcommittees that is hosting this hearing. We need to focus on consumer protection, on how we can protect people now by speeding the replacement of tires and protecting them in the future by ensuring that we have adequate safety rules and regulations in place.

Again, so we all recognize the personal aspects of it, just yesterday I was in our district in Houston in 105 degree temperatures and happened to have a flat tire. Being away from the closest place, I changed the tire myself and went to the service station to buy another one and the only tire they had to replace the one on my Blazer, an SUV, was a Bridgestone tire. And I asked the service station, I want to make sure that it is not one of those recalled because I had not heard Bridgestone, only Firestone, as having problems. Hopefully, not only that tire that I bought but also many of the tires that are at retailers around the country or in the inventory in our factories are also being checked to make sure that they are safe. We need to look to the future to see what we can do to correct the problem instead of just worrying about covering our own industry or our own agency or our own Members of Congress.

I want to ensure that when consumers who have these recalled tires on their vehicles get them replaced, that they have the ability to choose the tires that they want. I also want to ensure that the compensation that is going to be provided to them by Bridgestone/Firestone and that it fairly and accurately reflects the cost of the new tires for the consumers on their vehicles, and hope that we can get these and other questions answered, Mr. Chairman. I yield back the balance of my time.

Mr. TAUZIN. The Chair yields to the gentleman from North Carolina, Mr. Burr, for an opening statement.

Mr. BURR. Mr. Chairman, I would ask unanimous consent that my written statement be entered into the record.

Mr. TAUZIN. The Chair asks unanimous consent that all members' written statements will be made a part of the record, as well as the written statements of all of our witnesses who will follow, we hope soon, and without objection that unanimous consent is granted.

Mr. BURR. I thank the Chair for that consent. I would like to take my opportunity to more personally address those in attendance today who have the power to make decisions and the power to implement solutions.

Mr. Nasser and Mr. Ono, let me say specifically to both of you, please put financial and legal concerns aside today and do everything possible to make sure that the solutions are implemented in a way that the security for every person out there is taken care of. You have a responsibility to your shareholders, but you also have a responsibility to those who purchase your product, and this is an opportunity to prove exactly how strong your commitment is to your customers.

Ms. Bailey, put the excuse aside of not enough resources and concentrate on how to work with the Congress and with these companies to make sure that NHTSA performs the type of job that I believe they are capable of doing and by design they should be doing.

On my way to the airport this morning as I complained with coming back from a break and faced with a very difficult hearing, I passed on the side of the road an SUV with a shredded tire, a fresh reminder of exactly why I was headed back. Fortunately enough it had not rolled, but I would ask everybody here to concentrate today on the individuals, the human faces behind this issue, those who might be family members of somebody who was killed, but more importantly the 14-plus million people who possibly today could get in a car that has recalled tires that have not been switched and ask the question how far can we go. How long will they last. Can I hold out until the replacements come. Trust me when I say that every person who falls in that category is stressed today relative to their safety and the safety of their families. I would ask all of you to focus on that. Let no one leave this hearing today without agreeing that a serious problem exists and that it must be solved at whatever cost as quickly as we possibly can.

I thank the Chair for the leniency, and I yield back the balance of my time.

[The prepared statement of Hon. Richard Burr follows:]

PREPARED STATEMENT OF HON. RICHARD M. BURR, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF NORTH CAROLINA

Mr. Chairman, thank you for holding this important hearing. I would also like to thank all of our witnesses for agreeing to testify today. I should be very clear—we are not here today to point fingers of blame. We are here to find the answers to some very troubling questions. The American people deserve answers to their questions—not the press releases and television ad campaigns they've been getting.

Over the course of the last month, over 14 million tires have been recalled due to their involvement in accidents that have taken almost 90 lives. I am troubled by reports that Ford and Firestone may have known about flaws in the tire design and manufacturing process for years, and that the companies continue to disagree over proper tire pressure recommendations. I am also disturbed by the role NHTSA has played since it was first alerted to the potential problem, apparently over two years ago.

Mr. Nasser and Mr. Ono, we understand that you have a fiduciary responsibility to your shareholders. But you have a responsibility to those who buy your products as well. There are serious concerns among many in this country, and, I imagine, most members of the committee, that your companies have not met that responsibility. I hope you will take advantage of this opportunity to address those concerns.

Dr. Bailey, it is my understanding that you are new to NHTSA. Let me apologize in advance for what will clearly be a baptism-by-fire. Your agency, however, deserves some serious attention in these proceedings as well. Of particular concern to me is an explanation as to why reports of 21 tread separation incidents by a large insurer did not send up red flags at the agency.

This hearing will no doubt begin with the basic questions asked at every oversight hearing: what did they know, when did they know it, and what did they do about it. It will begin that way because serious discrepancies remain between the various parties'. Having read our witnesses' prepared testimony, it appears those discrepancies remain.

Based on what I've seen and heard, someone out there knew, they've known for awhile, and not a great deal was done about it. This hearing, and the likely follow-up hearings, will seek to discover the answers to those questions. The sooner that happens, the better for everyone involved. Just this morning, on my way to the airport, I passed a Ford Explorer parked on the side of the highway. Yes, one of it's tires was shredded. That driver, whoever it is, deserves an answer. And that driver deserves that answer now.

Mr. TAUZIN. I thank the gentleman. The Chair recognizes Mr. Rush for an opening statement.

Mr. RUSH. Thank you, Mr. Chairman. Mr. Chairman, I also want to commend you and the other chairman for this timely hearing. We have a consumer safety crisis on our hands. Millions of consumers are driving on highways with tires that may separate and cause fatal injuries. There are a few basic questions that we must have answered.

The first is whether this situation is a failure of NHTSA to properly carry out its enforcement responsibilities, and the second is whether Firestone and Ford refused to address the problem which they knew existed for years in order to save themselves embarrassment and money. Regardless of who is responsible, it is a travesty and it is an American consumer problem. American consumers are at risk, are suffering, and are dying. The American consumer is relying on us, this committee, this Congress, this government, to protect them from incidents like this. I hope that at the conclusion of this hearing that we will be able to determine the appropriate course of action to prevent this problem from ever occurring again.

Mr. Chairman, I am open to any reasonable conclusion, whether it be revisiting or upgrading our tire safety standards or whether it be enacting tougher enforcement protocols so that NHTSA can act quicker in similar situations or even providing for tougher penalties, including sanctions, for those who knowingly violate the motor vehicle safety standards.

Mr. Chairman, the tire is an important and integral part of a vehicle, and we owe it to the American people to provide reasonable protections where they cannot be expected to protect themselves.

With that in mind, Mr. Chairman, I yield back the balance of my time.

Mr. TAUZIN. The Chair thanks the gentleman from Illinois. The Chair now recognizes for an opening statement the gentleman from Tennessee, Mr. Bryant.

Mr. BRYANT. Thank you, Mr. Chairman, for holding this hearing and I want to thank also the witnesses that will be here today testifying, especially the chairmen from two great companies, Firestone and Ford, for being here today to answer our questions. I know that this is a prolonged process for everyone here, listening to members give opening statements, but this, as a representative form of government, this is one of the ways that our constituents, your consumers, can speak directly to you. That is through our statements and comments about what we hear when we are back in our districts talking to our constituents. Like many of the members in this room, I have constituents who are, and I believe rightfully so, very concerned about the safety of their vehicles.

It is my hope that today's hearing will help alleviate some of those concerns and place this issue of safety in a proper context. I do not, like my colleague from Tennessee on the other side of the aisle, believe that the focus of today's hearing should simply be on blame. That will have to ultimately be decided in other venues across this country, as numerous lawsuits are being filed as I speak. I believe this hearing, though, presents us with two opportunities. First, we need to examine whether or not the laws and regulations already on the books need to be enhanced to ensure consumer safety. Second, we need to determine whether appropriate steps were taken by Ford, by Firestone, and by the National Highway Traffic Safety Administration to ensure that no more lives are to be lost or people injured as a result of accidents associated with the recalled tires.

I have a longer statement, Mr. Chairman, but in the interest of time I will submit that to the record. I look forward to the testimony of these witnesses and again thank you for chairing this very appropriate and timely hearing.

Mr. TAUZIN. I thank my friend. The Chair now recognizes the gentleman from Maryland, Mr. Wynn, for an opening statement.

Mr. WYNN. Thank you, Mr. Chairman. I would also like to thank Chairman Upton for calling this important hearing. At these hearings we sit on the dais and we are supposed to take a dispassionate look at the issue before us; but I have to acknowledge it is very difficult because it runs through my mind that 88 people are dead and at some point along that continuum some of those deaths were preventable. I don't think that is an issue, the guilt or innocence, that this committee should attempt to resolve. It is properly before the courts in individual claims, but it does bring to my mind the seriousness of the issue. Some of these deaths were preventable. It is my perspective that this hearing is not designed to determine what went wrong with the tires. It would be nice if that were the outcome, but I think it is probably more likely that we will explore what went wrong with the way that we, both government and industry, respond to this type of crisis.

I have several issues that I would like to hear about from our witnesses today, the first of which has to do with the, "legal duty to report foreign recalls." It seems to me that along that continuum a discussion was held about whether or not officials in this country ought to be made aware of problems, including deaths, from this situation, this product, which occurred in other countries. Apparently a conclusion was drawn that there was no, "legal duty to report this information to U.S. officials."

Second, and this is probably naive on my part, I wonder whether anyone considered whether there was a moral duty to report this to American officials. I am very interested to hear what leaders of these two fine companies have to say on the subject about where responsibility lies in responding to this particular crisis and this particular problem.

You know, many of us here would like to talk about industry self-regulation, it has almost become a mantra, and government reduction rather than government regulation. I think this situation has probably laid that to rest and I think this makes it abundantly clear that there is a proper role for aggressive government regulation, particularly in areas of public safety.

Second, I am interested in hearing about the role of government officials in responding to this crisis, specifically at the National Highway Traffic Safety Administration. I think it has been stated earlier it has taken an inordinate amount of time for the agency to act, even allowing for the lack of resources, which is within Congress' bailiwick to correct. From 1998 to May of 2000 seems to be an inappropriately long period of time, particularly when there were reports all around that this was a serious problem.

I am also concerned about a report that files that were initially denied from State Farm were later found within the materials available and existing at the agency. Some individual was not appropriately forthcoming.

Let me conclude by saying this. We will not attempt to assess blame here and we will not attempt to determine guilt or innocence, but I hope that we will spur a very broad recall, that the cost-benefit analysis will be set to the side and that it will have the broadest possible recall and not just confine it to Decatur so that as many people as possible will feel the maximum degree of safety.

I hope that this process will happen quickly, that it will not have a lengthy delay, protracted analysis of whether we ought to expand the recall or not and, as my colleague from North Carolina said, we set aside those concerns and consider the benefit of the American consuming public.

I think this is a very good hearing and I look forward to the testimony of the witnesses, and I yield back the balance of my time.

Mr. TAUZIN. I thank my friend for his excellent statement and yield to the gentleman from California, Mr. Rogan, for an opening statement.

Mr. ROGAN. Mr. Chairman, I want to echo the sentiments of my colleagues who have spoken before me in thanking you for calling this hearing. Also I want to thank the excellent staff for their work that has gone into the preparation of this hearing. I do have an opening statement, but I note that we are now more than 1½ hours into our hearing and we have not heard from the first witness yet. To expedite this procedure, I will take advantage of general leave and submit my opening statement for the record, and I yield back the balance of my time.

[The prepared statement of Hon. James E. Rogan follows:]

PREPARED STATEMENT OF HON. JAMES E. ROGAN, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF CALIFORNIA

I thank the Chairman for his leadership on this issue and for calling hearings on this important subject. I also appreciate the presence of each witness here today, and regret Secretary Slater's decision to refuse to testify at this important hearing.

The Firestone Tire recall has been on the mind of millions of Americans for over a month now. There is hardly a family in America who does not either own a Ford SUV with Firestone Tires or know one who does. And for many families, and certainly for our Committee, these questions must be answered: What information was known by the relevant parties, where was the information obtained, and why was no action taken sooner to correct a defective product in the marketplace? The goal of this Committee is not to affix blame or legal liability. It is our goal to expedite answers to these questions fairly and quickly, so that policies may be pursued to protect consumers.

Firestone tires are driven daily by millions of families, including families in my home state of California where a large percentage of Ford Explorers, Rangers and Mercury Mountaineers with Firestone tires currently are in use. Families that own an affected vehicle or tire, need not just an explanation as to how this problem grew so severe, but they need the assurance that their safety is not in jeopardy.

As policy makers, we must insure the Department of Transportation, National Highway Transportation Safety Administration, and Congress take whatever steps are needed to ensure defective products do not make it to the market without adequate safety review. This hearing will be an important step in that direction.

Again, I thank the Chairman for holding this urgent hearing.

I yield back the balance of my time

Mr. TAUZIN. I thank the gentleman and hope other members might want to follow suit. The gentlewoman from Colorado, Ms. DeGette, is recognized.

Ms. DEGETTE. Thank you, Mr. Chairman. I had the unfortunate experience when I was a student of having a tire fall apart on me as I drove down the highway at 60 miles per hour, and luckily I am here today to talk about this but it was a terrifying experience and I can only imagine what it would be like for Mr. Bilbray's constituent with a car loaded up with children and vacation equipment.

After that experience, I decided I would no longer purchase tires that were substandard, and that I would only purchase tires that were the standard of the industry. So I can't help but reflect what the owners of the vehicles containing the 6.5 million tires of the Firestone ATX and Wilderness tires that we are talking about here today are wondering about as they drive their vehicles and they think they too are driving the standard of the industry.

I think it is pretty clear that any entity involved with these products must act quickly and decisively to both replace the faulty tires, and perhaps more importantly to replace public confidence in these products. Regrettably the quick, decisive action necessary did not occur with this recall. As the story of the recall unfolded, more questions about corporate responsibility and culpability arose than were answered.

The Nation's largest auto insurance company claimed it told safety regulators at NHTSA 2 years ago of 21 failures of the kind of tires Firestone has recalled. This is a high failure rate for tires, yet no action was taken to investigate the failures either by Firestone or frankly by Federal regulators. ATX and Wilderness tires were recalled internationally long before any investigation was begun in the U.S., and neither Ford nor Firestone informed Federal regulators of the recall. The signs were clear, the problem known and yet NHTSA ignored warning signs. Firestone was slow to issue a recall, and Ford failed to push them to the point. Regrettably, rather than taking clear, resolute action to recall the faulty tires as soon as the problem emerged, the companies involved with this recall appeared to drag their feet, playing Ping-Pong with potential blame. And I agree the purpose of this hearing is not to assign blame but rather to figure out what can be done better and how to restore consumer confidence. I think we are left with a lot of questions. I am not sure that I can ask the questions in the 5 minutes allotted of the panel. Here are some of them.

Is NHTSA really this hamstrung? What tools does the Federal Government have to monitor the safety of vehicles and their components? Is the Federal Government forced to rely on manufacturers' own determinations about the safety of their products? And if so, are the regulations too weak and need to be strengthened or does the industry itself have a responsibility to increase its self-regulation?

It is clear that NHTSA was slow to act and, as I said, the companies don't fare much better in this. This recall is costly because of the immediate expense, but also because of the long-term effect of rebuilding consumer confidence. I hope that today's witnesses can agree that the main focus of the hearing and the main focus of any recall must be consumer safety. I also hope we can uncover what mistakes were made in this issue and identify what steps can be taken in the future to identify the problems sooner and to have a quicker resolution.

Thank you, Mr. Chairman. I yield back the balance of my time.

[The prepared statement of Hon. Diana DeGette follows:]

PREPARED STATEMENT OF HON. DIANA DEGETTE, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF COLORADO

Thank you Mr. Chairman.

My colleagues have clearly identified many of the problems we seek to address in this hearing. While I hope that today's witnesses will be able to tell this Committee why these tires are failing at ten times the normal rate, it seems more research must be done in order to answer this question.

It is clear that the dramatic failure of Firestone ATX and Wilderness tires is wholly unacceptable. With 6.5 million of these tires on the road, as standard equipment on one of the most popular cars in America, it is also clear that any entity involved with these products must act quickly and decisively to replace the faulty tires.

However, the quick, decisive action necessary did not occur with this recall. As the story of this recall unfolded, more questions about corporate responsibility, and culpability arose than were answered. The nation's largest auto insurance company claimed it told safety regulators at the National Highway Transportation Safety Administration (NHTSA) two years ago of 21 failures of the kind of tires Firestone has recalled. This is a high failure rate for tires, yet no action was taken to investigate those failures, either by Firestone or Federal regulators. ATX and Wilderness tires were recalled internationally long before any investigation was begun in the U.S., and neither Ford nor Firestone informed Federal regulators of that recall. While the international recall has been broadened to include not only the 15-inch models under recall here, but also 16-inch models, Firestone and Ford refuse to expand the recall here at home. And, perhaps most alarming, 88 U.S. fatalities, and 250 injuries have been linked to accidents involving Firestone tires as of September 1, according to NHTSA. The signs were clear, the problem known, yet NHTSA ignored warning signs, Firestone was slow to issue a recall, and Ford failed to push them to that point.

Regrettably, rather than taking clear, resolute action to recall the faulty tires as soon as a problem emerged, the companies involved with this recall appear to have dragged their feet, playing ping pong with potential blame. Too much attention appears to have been paid to the finger pointing campaign to shift responsibility, while not enough attention was given to indications that a recall should have been issued long before last month. Owners of Firestone ATX and Wilderness tires are demanding to know why the effort expended in the media race to take cover and shift blame was not redirected—initially to issue a recall earlier, or, once one was issued, to replace their faulty tires more quickly. These are questions I hope we can address today.

The Federal agency charged with ensuring the safety of the driving public seemed stagnant too. Massive recalls of Firestone ATX and Wilderness tires were issued in the Middle East, South America and Asia, yet NHTSA was oblivious to them. The agency has said they do not have the authority to require companies to provide them with information on international recalls, nor the ability to access data that could point to problems like this defect. Is the agency really this hamstrung? What tools does the federal government have to monitor the safety of vehicles and their components? Is the federal government forced to rely on manufacturers' own determinations about the safety of their products? If this is the case, regulations are weak indeed and it is no wonder that NHTSA was unaware of a major problem with tires that are in wide circulation nationwide. The agency was slow to act, and should that be the result of weak regulations or the agency's own failures, something must change as a result of this recall.

While I am sure that we will delve deeply into the specific problems surrounding this situation, perhaps we should also use this hearing to examine the broader issues that surround a recall of any product. In this case, Ford and Firestone have an enormous stake in avoiding a recall—but this is true of any company.

A recall is costly, not only due to the immediate expense of replacing a product, but also the long-term expense of rebuilding consumer confidence in the entire company, as shown by the six percent drop in Ford's stock on August 31. How can we ensure that the public's best interest is represented when a product must be recalled, not a company's bottom line? Was this recall delayed because Firestone or Ford feared its financial ramifications? How can we ensure that companies will act with safety as their utmost concern to issue recalls irregardless of the perception problems that will inevitably emerge from that act?

I hope today's witnesses can agree that the main focus of this, or any other recall, should be consumer safety. Additionally, I hope this hearing can uncover where mistakes were made in issuing this recall and identify what steps should be taken in the future to detect problems sooner, to share information better and to act more quickly to remove faulty products from the market.

Mr. TAUZIN. The Chair thanks the gentlewoman and recognizes the gentleman from Illinois, Mr. Shimkus.

Mr. SHIMKUS. Thank you, Mr. Chairman. First, I want to welcome Dr. Bailey and let her know that most of us recognize that you have been on the job for 3 weeks, so it is a cause by fire but we are glad to have you here.

I also want to welcome Samuel Boyden from Bloomington, that is Tom Ewing's congressional district, with State Farm insurance company. I think he is going to have compelling testimony and I am glad that he is here.

Most of the comments have been said. I fall back to a lot of things in my background, and part of the West Point cadet prayer says, "Teach us to do the harder right over the easier wrong and not be content with the half truth when the whole can be won," and I leave our panelists with that, really echoing comments of my colleagues, Mr. Gordon and Mr. Burr, who said let's get to the facts and fix the problems and move forward.

I thank you for holding this hearing, Mr. Chairman.

Mr. TAUZIN. I thank the gentleman. The Chair now yields to the gentleman from Minnesota, Mr. Luther.

Mr. LUTHER. Thank you, Mr. Chairman, for holding this timely hearing. I will be brief. As has been said by others, finger pointing is the tendency in Washington. I hope, as others do, that we can avoid this tendency at today's hearing.

To date 88 deaths have been attributed to tread separation problems on these tires. That much we know. What we don't know is why 88 people and perhaps many more had to die before definitive action was taken. Clearly the system failed the American consumer. It appears that our consumer safety standards are antiquated and must be updated, that Congress failed to act back in 1978 when faced with a similar disastrous recall, and that the communications structure between the private and public sectors and between parties within the private sector broke down and failed.

I think this hearing can be useful in helping all of us determine what to do next. It can help us make sure that every tire in this country that needs to be recalled is in fact recalled immediately, and it can help us repair the systems so that tragedies like this never happen again. So I hope we can have a constructive, informative hearing that results in real protection and real safety for the American consumer.

Thank you, and I yield back the balance of my time.

Mr. TAUZIN. I thank the gentleman. The Chair now yields to the gentlelady from New Mexico, Ms. Wilson, for an opening statement.

Mrs. WILSON. Thank you, Mr. Chairman. I have spent quite a bit of time looking at the documents related to the recall, and I have a lot of questions for the people who will testify, but I think there are some things which are clear to me at this point.

The first is that Firestone knew they had a problem and didn't act until it was forced to do so. We have seen claims in the last month that they didn't know until July of this year and now you are working around the clock to find out what is wrong. That is rubbish. You knew you had a problem a long time ago. You had recalls in 18 countries. This committee staff has uncovered memos going back to 1997. You knew you had a problem and you didn't do anything about it. We need tougher rules to protect American consumers when multinational corporations make recalls in other countries and fail to notify the appropriate authorities in the United States and United States consumers.

The second thing I think we need to focus on has to do with NHTSA. Sam Boyden is a State Farm researcher and a car buff, and he sent an e-mail to NHTSA in July 1998 about 21 cases, 2 of which involved fatalities, saying there is a problem here, this shouldn't happen with a tire, and contacted NHTSA twice more in 1999. But those were ignored and put in a file. So why didn't the watchdog bark? We deserve an answer.

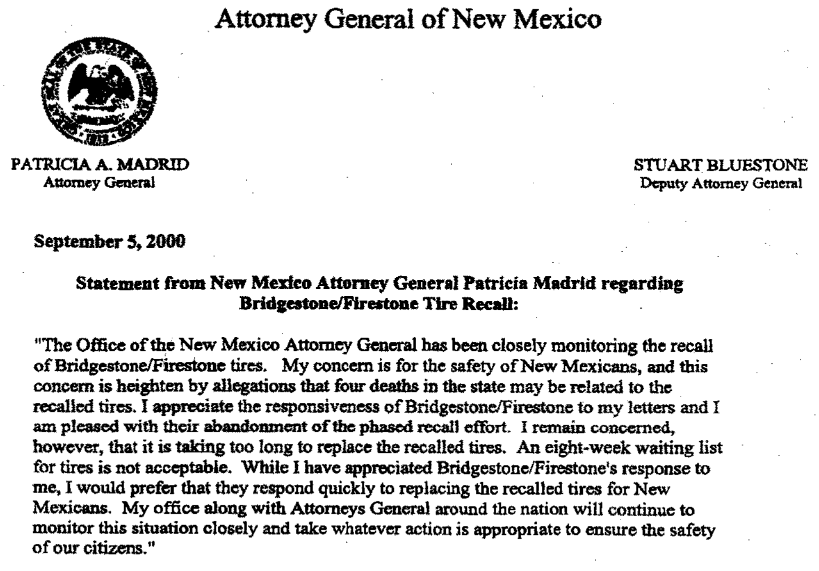
Third, Firestone has launched and conducted a lousy recall full of missteps and misinformation. 9 of the 88 fatalities have occurred in the State of New Mexico. 9 of 88. That is 10 percent of the fatalities of this tire in the State of New Mexico. The company admits that hot weather and long distances and high speeds are factors in these tire failures. Ten percent of the fatalities in New Mexico, a state with less than one-half of one 1 percent of the population in the United States. But I ask you gentlemen, to look at this map. The blue areas are where you have prioritized your supply for fixing this recall. There is one southern, hot western state that doesn't make your list, and I would like to know today why New Mexico is being overlooked by your company.

I would like to enter into the record the correspondence between the state attorney general from New Mexico and Bridgestone/Firestone giving lip service to the problems in New Mexico and the backlog of tires to replace the ones that are killing the citizens in my state.

I yield back the balance of my time.

Mr. TAUZIN. Without objection the gentlelady's request for introduction of these documents into the record is agreed to.

[The following was received for the record:]



Attorney General of New Mexico

PATRICIA A. MADRID
Attorney General

STUART BLUESTONE
Deputy Attorney General

September 5, 2000

Statement from New Mexico Attorney General Patricia Madrid regarding Bridgestone/Firestone Tire Recall:

"The Office of the New Mexico Attorney General has been closely monitoring the recall of Bridgestone/Firestone tires. My concern is for the safety of New Mexicans, and this concern is heighten by allegations that four deaths in the state may be related to the recalled tires. I appreciate the responsiveness of Bridgestone/Firestone to my letters and I am pleased with their abandonment of the phased recall effort. I remain concerned, however, that it is taking too long to replace the recalled tires. An eight-week waiting list for tires is not acceptable. While I have appreciated Bridgestone/Firestone's response to me, I would prefer that they respond quickly to replacing the recalled tires for New Mexicans. My office along with Attorneys General around the nation will continue to monitor this situation closely and take whatever action is appropriate to ensure the safety of our citizens."

Attorney General of New Mexico

PATRICIA A. MADRID
Attorney General

STUART M. BLUESTONE
Deputy Attorney General

August 16, 2000

Masatoshi Ono, President
Bridgestone/Firestone Corporation
50 Century Boulevard
Nashville, Tennessee 37214

SENT VIA FACSIMILE AND
CERTIFIED MAIL

Re: Tire Recall; Terms Unacceptable to the State of New Mexico.

Dear Mr. Ono:

I am writing to inform you that, after having carefully reviewed the terms of your recall of Radial ATX, ATX II and Wilderness AT tires, the State of New Mexico Attorney General's Office ("Office") has determined the recall inadequate and unacceptable. This is particularly true with regard to the State of New Mexico being placed in Phase 3 of Firestone's announced recall plan.

It is the understanding of this Office that the danger for problems with these tires is enhanced by hot weather conditions. Without question, the State of New Mexico is a hot weather state. Temperatures in New Mexico are routinely in the high 90s, and often higher. Thus, given the life-safety issues at stake for the citizens of New Mexico, this Office must demand that New Mexico be moved to Phase 1 of the recall plan.

Information distributed by Firestone states that you prioritized the recall to favor those states where you believe most tire failures to have occurred. These states surround New Mexico geographically and share similar weather conditions. There does not appear to be a reasonable basis why New Mexico was not initially designated a Phase 1 state. Further, this Office is in receipt of information that the tires at issue may be a key factor in accidents that resulted in the death of at least four New Mexico citizens. This information stems from our preliminary investigations. We may find that the number of tire failures and serious accidents are greater in number.

PO Drawer 1508 Santa Fe, New Mexico 87504-1508 505/ 827-6000 Fax 505/ 827-5826

Given the extensive and grave harm reported to date and the hot weather, distances and road conditions known to exist throughout New Mexico, this office is confident Firestone will correctly reprioritize New Mexico as a Phase 1 state in the recall.

Please send written confirmation that New Mexico has been moved to Phase 1 of the recall to Mr. Robert E. Reyna, Director of the Consumer Protection Division, no later than five days following receipt of this letter. Mr. Reyna may be reached by telephone at (505) 827-6075 and by facsimile at (505) 827-6685. Failure to provide this written confirmation may result in this office taking immediate legal action to appropriately and responsibly protect the lives and property of the people of New Mexico.

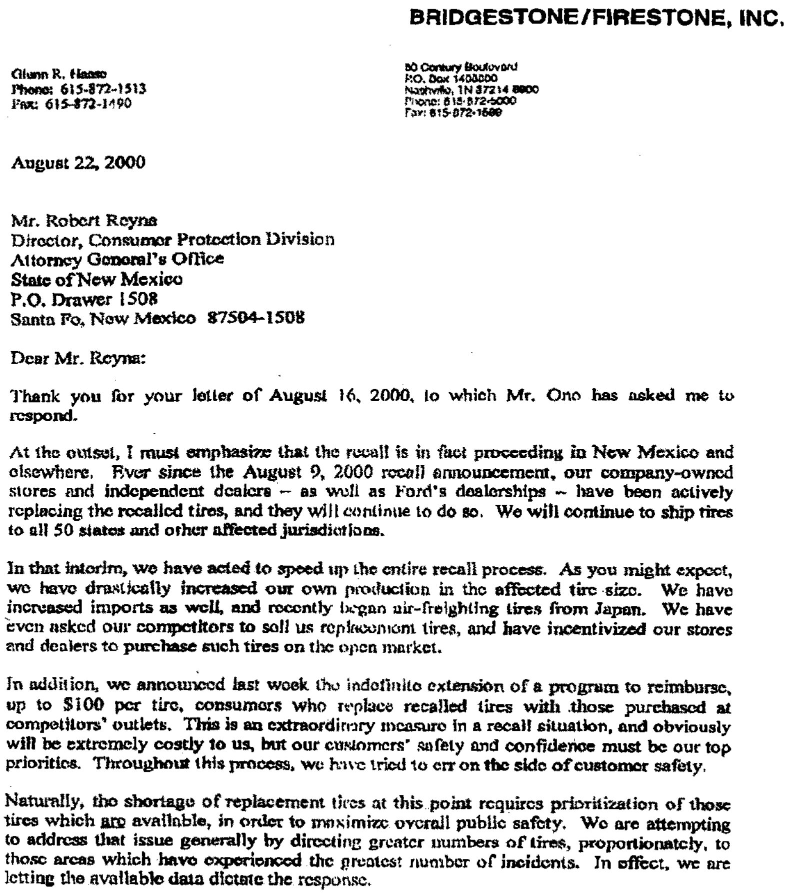
These recall issues must be resolved promptly. If they are, New Mexico will agree to discussions with Firestone, to be scheduled in the near future, to address issues such as the delay in implementing the recall, as well as other consumer protection concerns.

We look forward to your immediate response to this correspondence, and appreciate your cooperation in working with this Office to resolve these matters.

Sincerely,

PATRICIA A. MADRID
State of New Mexico Attorney General

By: Robert E Reyna
Robert E. Reyna, Director
Consumer Protection Division



BRIDGESTONE/FIRESTONE, INC.

Glenn R. Haase
Phone: 615-872-1513
Fax: 615-872-1490

50 Century Boulevard
P.O. Box 140990
Nashville, TN 37214 0990
Phone: 615-872-5000
Fax: 615-872-1599

August 22, 2000

Mr. Robert Reyna
Director, Consumer Protection Division
Attorney General's Office
State of New Mexico
P.O. Drawer 1508
Santa Fe, New Mexico 87504-1508

Dear Mr. Reyna:

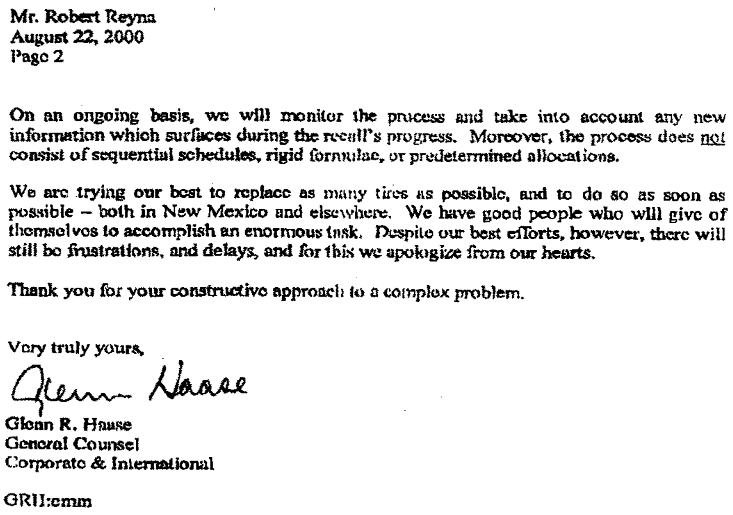
Thank you for your letter of August 16, 2000, to which Mr. Ono has asked me to respond.

At the outset, I must emphasize that the recall is in fact proceeding in New Mexico and elsewhere. Ever since the August 9, 2000 recall announcement, our company-owned stores and independent dealers -- as well as Ford's dealerships -- have been actively replacing the recalled tires, and they will continue to do so. We will continue to ship tires to all 50 states and other affected jurisdictions.

In that interim, we have acted to speed up the entire recall process. As you might expect, we have drastically increased our own production in the affected tire size. We have increased imports as well, and recently began air-freighting tires from Japan. We have even asked our competitors to sell us replacement tires, and have incentivized our stores and dealers to purchase such tires on the open market.

In addition, we announced last week the indefinite extension of a program to reimburse, up to $100 per tire, consumers who replace recalled tires with those purchased at competitors' outlets. This is an extraordinary measure in a recall situation, and obviously will be extremely costly to us, but our customers' safety and confidence must be our top priorities. Throughout this process, we have tried to err on the side of customer safety.

Naturally, the shortage of replacement tires at this point requires prioritization of those tires which are available, in order to maximize overall public safety. We are attempting to address that issue generally by directing greater numbers of tires, proportionately, to those areas which have experienced the greatest number of incidents. In effect, we are letting the available data dictate the response.



Mr. Robert Reyna
August 22, 2000
Page 2

On an ongoing basis, we will monitor the process and take into account any new information which surfaces during the recall's progress. Moreover, the process does not consist of sequential schedules, rigid formulae, or predetermined allocations.

We are trying our best to replace as many tires as possible, and to do so as soon as possible – both in New Mexico and elsewhere. We have good people who will give of themselves to accomplish an enormous task. Despite our best efforts, however, there will still be frustrations, and delays, and for this we apologize from our hearts.

Thank you for your constructive approach to a complex problem.

Very truly yours,

Glenn Haase

Glenn R. Haase
General Counsel
Corporate & International

GRH:cmm

Attorney General of New Mexico

PATRICIA A. MADRID
Attorney General

STUART M. BLUESTONE
Deputy Attorney General

August 28, 2000

Mr. Glenn Haase
General Counsel
Bridgestone/Firestone Corp.
50 Century Boulevard
Nashville, Tennessee 37214

Re: Follow-up to your letter of August 22, 2000 to Attorney General Patricia Madrid of the State of New Mexico.

Dear Mr. Haase:

Thank you for your August 22, 2000 response to this office's letter of August 16, 2000. Your courtesy and timeliness are appreciated. However, the information you provided in response to this office's inquiry, together with information received from nearly 40 states, gives rise to additional concerns and questions. Consequently, I respectfully request your answers to the following questions and issues:

1. This office has received information that the Firestone dealer in Santa Fe, New Mexico has more than 400 people on a waiting list for replacement tires, and that the wait for receiving the replacements may be as long as eight (8) weeks. Given the safety issues at stake for New Mexico families, this reported wait is unacceptable.

   After conferring with Attorneys General across the nation, this office has determined that this delay in receiving replacement tires is significantly greater than many other states. As such, we must ask: **What will Firestone/Bridgestone do to remedy such waiting lists and delays in New Mexico?** As discussed in the August 16 letter, the heat, rural conditions and long distances of New Mexico's roads require New Mexico be made a priority in the recall. Therefore, more replacement tires must be provided to New Mexico tire dealers immediately. This is our number one priority right now.

2. This office is in possession of national investigative information that directly contradicts much of the information that has been disseminated by Firestone to the public throughout the recall. This information details Firestone blowouts resulting in accidents, the types of vehicles involved, the

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serial/identification number of the tires involved, and the manufacturer of the tires involved. This information indicates that:

- ➤ The defective tires are not limited to 15-inch tires, or to tires with the specific serial/identification numbers provided by Firestone in its recall information. Many tires involved in blowout accidents are 16-inch tires, or are 15-inch tires with a slightly different serial number.
- ➤ The defective tires are not limited to those that were manufactured at the Decatur, Illinois plant. Approximately one-fourth of the defective tires are believed to be from other Firestone plants, such as the Joliet (Canada) and Wilson (North Carolina) plants.
- ➤ The defective tires are not limited to those allegedly manufactured during a strike at the Decatur plant.

Given these discrepancies, please provide this office the documentation relied upon by Firestone in making its public statements on these matters.

Also, please advise this office if Firestone is remaining committed to the position that it is only those ATX and ATXII tires with the identification number P235/75R15, and the Wilderness Tires with the identification number P235/75R15 that are to be considered defective.

Additionally, please advise this office if Firestone is remaining committed to the position that the tires at issue are only those manufactured at the Decatur plant. A point of interest for you may be the fact that this office leases a vehicle that has 15-inch Firestone tires on it. When we took that vehicle to a local Ford dealership to have those tires replaced, the dealer informed us it would not be done under the recall because the tires were not manufactured at the Decatur plant.

3. An expert physicist who has analyzed the tires at issue for the purposes of private litigation has provided this office information that air pressure (26 psi vs. 30 psi) is not related to the tire failures. Please provide this office the documentation Firestone has relied on in making its public representations relating to tire pressure being a cause factor in the blowout accidents that have occurred.

Likewise, this expert has advised this office that the defective tires cannot be detected upon inspection. Again, please provide this office the documentation relied upon by Firestone in making its public representations that preventative action can be achieved through having the tires inspected.

4. Finally, this expert has advised this office that the problem may well be a matter of design defect. Please provide this office documentation regarding the design differences between the 15-inch tires at issue, and the 16-inch tires that are not part of the recall. Specifically, please identify what makes the 16-inch tire different and safe.

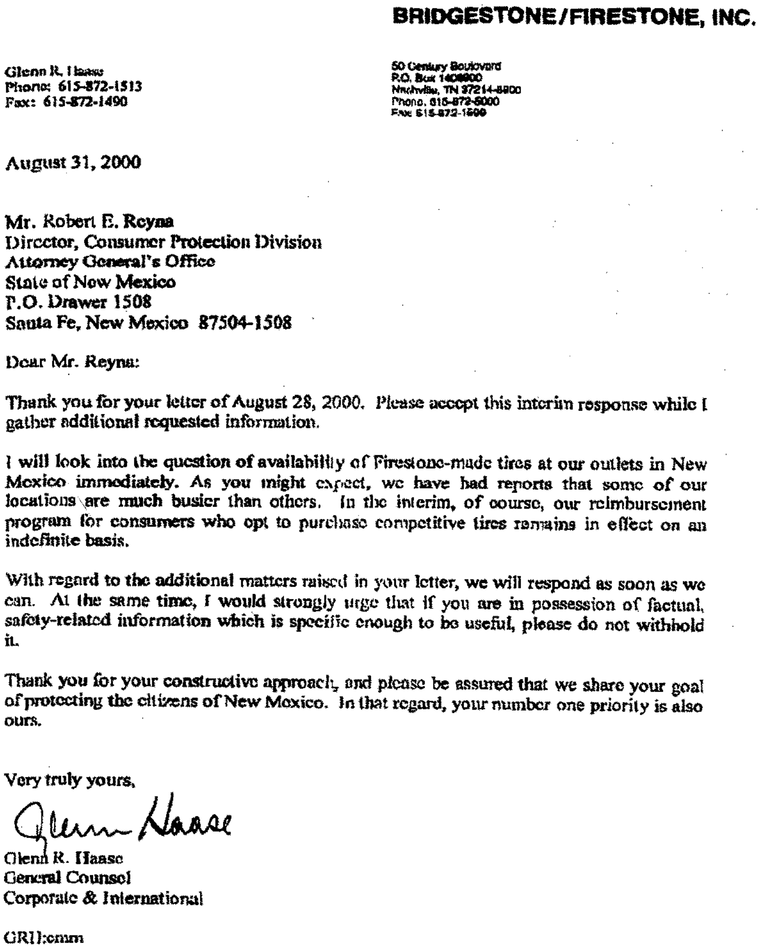
Thank you for your cooperation to date in providing New Mexico with helpful information regarding the recall, and for understanding this office's concern for the safety of the people of New Mexico. We look forward to receiving your response within five (5) business days and, in particular, to learning of your immediate plans to address the serious waiting list problems New Mexicans appear to face.

Please direct your response to Mr. Robert E. Reyna, Director of the Consumer Protection Division. If you have any questions regarding the information and/or inquiries set forth in this letter, you can reach Mr. Reyna by telephone at (505) 827-6075.

Sincerely,

PATRICIA A. MADRID
Attorney General, State of New Mexico

By:
Robert E. Reyna
Director, Consumer Protection Division



BRIDGESTONE/FIRESTONE, INC.

Glenn R. Haase
Phone: 615-872-1513
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50 Century Boulevard
P.O. Box 140990
Nashville, TN 37214-8900
Phone. 615-872-5000
Fax 615-872-1599

August 31, 2000

Mr. Robert E. Reyna
Director, Consumer Protection Division
Attorney General's Office
State of New Mexico
P.O. Drawer 1508
Santa Fe, New Mexico 87504-1508

Dear Mr. Reyna:

Thank you for your letter of August 28, 2000. Please accept this interim response while I gather additional requested information.

I will look into the question of availability of Firestone-made tires at our outlets in New Mexico immediately. As you might expect, we have had reports that some of our locations are much busier than others. In the interim, of course, our reimbursement program for consumers who opt to purchase competitive tires remains in effect on an indefinite basis.

With regard to the additional matters raised in your letter, we will respond as soon as we can. At the same time, I would strongly urge that if you are in possession of factual, safety-related information which is specific enough to be useful, please do not withhold it.

Thank you for your constructive approach, and please be assured that we share your goal of protecting the citizens of New Mexico. In that regard, your number one priority is also ours.

Very truly yours,

Glenn Haase

Glenn R. Haase
General Counsel
Corporate & International

GRH:cmm

Mr. TAUZIN. The Chair will now recognize the gentleman from California, Mr. Waxman, for an opening statement.

Mr. WAXMAN. Thank you, Mr. Chairman, for this opportunity to say a few words. I want to thank you for holding this hearing today. The hearings in the House and Senate are important for the airing of what went wrong with the deadly combination of Firestone tires and Ford Explorers. The public has a right to know what really went wrong, who knew what when.

I want to focus in on that theme when I get a chance to question the witnesses because I think it is important not just to have a hearing this one time, but to learn from all of the documents what people knew and what evidence there was that might have been a signal to the regulators and to the industry groups and executives that there was a problem and a signal to them that they should have done something to prevent the tragedies that have taken place. So having complete information is the only way we can move forward and I hope that we will get the cooperation of all of the witnesses in ensuring that we are fully informed.

This hearing serves a very important purpose. What follows after this hearing and the kind of cooperation that we get from the witnesses involved and their counsels will be important in getting all of that information that the public has a right to know.

Thank you for recognizing me, and I look forward to the testimony.

Mr. TAUZIN. I assure the gentleman that this is just the beginning of the investigation process and this committee along with the oversight committee intends to remain vigilant until all of the facts are known.

The Chair will now recognize the gentleman from Florida, Mr. Stearns, for an opening statement.

Mr. STEARNS. Thank you, Mr. Chairman. I also commend you and Mr. Upton for having this hearing.

Florida is fourth in the number of crashes yet accounts for the highest number of fatalities, according to the raw complaint data which has been collected by NHTSA. A question that I have, and perhaps it is a little different than a question that some members have talked about, which I would like to address to Dr. Sue Bailey, who is the Administrator of the National Highway Traffic Safety Administration, I looked over your testimony and I understand your screening process is quite involved, and you talk about how many cases come in and how many pieces of information cross your desk and so forth, but I find it hard to believe that a Federal agency with millions of dollars at its disposal and top of the line analysts and engineers, was bested by a lone researcher, with a part-time interest in cars, a hobbyist who was able to come together and identify this statistical analysis and this danger and e-mailed it to NHTSA, and I just can't understand, Mr. Chairman, how they with all of their millions of dollars cannot—why they couldn't find it before this lone researcher, part-time person dealing with cars. So I think that is one question that we would like to hear from Dr. Bailey.

Mr. Chairman, I am obviously concerned that the Honorable Slater, the Secretary of the Department of Transportation, is not here. Even though Dr. Bailey is here, I think he should be responsible and should show up here as a courtesy. We sometimes ask him to come and it is not often. I think under these circumstances he should be here. I think I share most of the sentiments my colleagues have already expressed, and I look forward to the hearing.

Mr. TAUZIN. I thank the gentleman. I recognize the gentleman from New York, Mr. Fossella, for an opening statement.

Mr. FOSSELLA. Thank you, Mr. Chairman. I think today the American people are just entitled to the truth. It appears that whoever is going to be testifying today, while not questioning their motives, I am afraid come to the table with not so clean hands. People have died. I think the objective right now is for all of you to come to this table, wash your hands clean and let us, let the American people know what the truth is, because the people I represent, and I am sure like everyone across the country, want to know right now if they are putting their kids in the back of that car, are they getting into a death trap or not. They want to know the truth. And all I ask you is to give it to us.

I yield back the balance of my time.

Mr. TAUZIN. I thank the gentleman. The Chair understands that there are no other members seeking recognition for an opening statement

[Additional statements submitted for the record follow:]

PREPARED STATEMENT OF HON. PAUL E. GILLMOR, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF OHIO

Mr. Chairman, I want to thank you for calling this hearing. The issues surrounding the tire recalls we will discuss constitute the largest public safety addressed during this Congress. I eagerly look forward to the testimony that will be presented before us.

The problems faced by the driving public because of catastrophic tire failures are not only serious, but also quite alarming. I am sure that many of my colleagues will spend today focusing on the time honored Washington question of: “what did you know and when did you know it?” While I see this as an important question, I, however, wish to concentrate my time on some other factors that have emerged within the context of these problems. I am not convinced that one person, company, or agency is to blame for all the accidents that have occurred. Rather, I think there is more than enough places for blame to go.

Where I want to concentrate my thoughts is on design, distribution, and testing issues. The Firestone ATX was initially manufactured as a passenger tire for use on the Ford Explorer. This would seem to indicate to me that both Ford and Firestone were well aware of the type of tire that was being placed on the auto. I think it is important to understand how much of a collaborative effort existed between the two companies.

Second, I have questions about the actual design of the Explorer and how the application of Firestone tires might have caused improper and potentially dangerous wearing on the treads.

Third, many of the accidents occurred in warm weather areas, including the Middle East, South America, and the Southwestern United States. How did the ATX, ATX II, and Wilderness tires fare in cooler climates? Did Firestone’s Decatur, Illinois plant only supply these warmer areas? If not, how did the Decatur-produced tires fare in other areas?

Fourth, many tire problems show up shortly after the tire has seen some wear. The Firestone tires began having problems after a couple years of usage. I think it is essential to know if Firestone had tested wear and how these tests were conducted. Also, does NHTSA presently require tire testing and certification? In conjunction with Firestone, had Ford conducted any testing of the ATX or other 15-inch tires on the Explorer? If Ford tested other tires, how did they fare?

Fifth, and finally, I think we need to examine ways in which the public’s care for their automobile can help prevent serious fatalities. One thing that sticks out for me was whether aesthetics and, lower tire pressure were encouraged at risks to the consumer’s safety. Also, what are essential maintenance requirements for these tires that may not have been passed along to Explorer owners.?

Unfortunately, I am skeptical that our witness panels will yield any definitive answers to the conundrums vexing us. Certainly, there will be some that will conclude that we need to expand the role of the National Highway Transportation Safety Administration (NHTSA) over sport utility vehicles. I think this is the wrong approach to the problem. Not only had Congress given NHTSA all the funding the White House requested, but also NHTSA was notified by State Farm Insurance Company two years ago that a problem might exist and ignored these messages.

Mr. Chairman, our panel will not look past the problems that have precipitated massive backlogs of tire requests at Ford dealers and tire outlets. Our duty is to find areas where improvements can be made and public safety reassured. And, again, I look forward to hearing from our distinguished witnesses to get their opinions. These issues concern not only those people who purchase Firestone tires and those who drive Ford Explorers, but those of us who share the same road they do and consider them part of our communities.

PREPARED STATEMENT OF HON. ED BRYANT, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF TENNESSEE

Thank you Mr. Chairman, I appreciate your holding this hearing, and I want to thank the chairmen of both Firestone and Ford for taking the time to answer our questions today. Like many of the Members in this room, I have constituents who are, and I believe rightly so, concerned about the safety of their vehicles and it is my hope that today's hearing will help to alleviate some of those concerns.

I do not believe that the focus of today's hearing should be on blame. That will ultimately have to be decided in the courts as the numerous lawsuits already being filed are argued before juries across the land. Rather, I believe this hearing presents us with two opportunities. First, we need to examine whether or not the laws and regulations already on the books need to be enhanced to ensure consumer safety. And second, we need to determine whether or not every possible step is being taken by Ford, Firestone, and the National Highway Traffic Safety Administration to ensure that no more lives are lost due to the accidents associated with the recalled tires.

In order to do this, I think we need to focus on three specific areas. First, when did the companies involved become aware of the problems associated with the tires. According to the Wall Street Journal, Ford has indicated that examples of tire failures on Explorers in Venezuela came to its attention in late 1998. The Journal also states that Ford began replacing tires in the Middle East last year due to similar concerns. Yet, it's not until a year later that a recall is issued in the U.S. At what point did the two companies begin to investigate tire failures in the U.S., and how much time elapsed between concerns about U.S. tires and the August 9 recall? Could this recall have occurred earlier if NHTSA had had access to the overseas information.

Second, is the recall broad enough. The August 9th recall has been limited to 15-inch tires, however, 16-inch tires are already being replaced in Venezuela. And in a consumer advisory, NHTSA has asked that the current recall be expanded to include an additional 1.4 million tires of various models and sizes. Have Ford and Firestone begun investigating whether or not the 16-inch tires have resulted in an unusual number of accidents?

Finally, are Ford and Firestone taking every appropriate step to replace the recalled tires. Few families in my district do not rely on their vehicles everyday, and it is my hope that Chairman Nasser and Chairman Ono will be able to update us on what steps they are currently taking and how long they anticipate it will be before all 6.5 million tires have been replaced.

I look forward to your testimony and yield back the balance of my time.

Mr. TAUZIN. The Chair will call the first panel. The first panel will consist of the Honorable Rodney Slater, Secretary of the Department of Transportation, who has been invited to attend, accompanied by Dr. Sue Bailey, Administrator of the National Highway Traffic Safety Administration. Like my friend Mr. Upton, Ms. Bailey, let me express the chairman's extraordinary disappointment at your boss' failure to attend this hearing. I can't imagine a more important hearing that this subcommittee has held in my tenure as chairman, and I assume that Mr. Upton is of the same opinion. This is a life or death hearing involving safety issues on the highways of American and I am astounded that the Secretary of Transportation, who is in town today and who was twice requested, once by the committee and once by me personally in a letter just yesterday and publicly over the airwaves to attend this hearing, could not find time to be with us here today to help solve some of these issues. I am particularly concerned that he has instead invited you to take his place here today when you are just new on the job, I think just 3 weeks, and we want to welcome you to this incredibly important job, and want to welcome your testimony today.

Before we begin that testimony, as previously announced, the chairman will swear all of the witnesses in as they appear, and I must take you through the process by which we do this.

Ms. Bailey, you are aware that this subcommittee is holding an investigative hearing, and when doing so has had the practice of taking testimony under oath. Do you have any objections to testifying under oath?

Ms. BAILEY. No.

Mr. TAUZIN. The Chair advises you that under the rules of the House and the rules of the Committee, you are entitled to be advised by counsel. Do you desire to be advised by counsel during your testimony today?

Ms. BAILEY. No.

Mr. TAUZIN. In that case if you would please rise and raise your right hand, I will swear you in.

[Witness sworn.]

Mr. TAUZIN. I thank you, Ms. Bailey. You are now under oath and you are recognized to give a 5-minute summary of your written statement.

TESTIMONY OF HON. SUE BAILEY, ADMINISTRATOR, NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION, U.S. DEPARTMENT OF TRANSPORTATION

Ms. BAILEY. Mr. Chairmen and members of the committee, I am pleased to appear before you today to address the investigation and the recall of Firestone tires. Secretary Slater refers to safety as the North Star of the Department of Transportation and under his leadership NHTSA is committed to preventing deaths, injuries and motor vehicle crashes. I will give you a quick overview of the agency's authority to investigate defects and describe the procedures that the agency follows and outline the Firestone investigation.

First our authority: Congress passed the basic motor vehicle safety law 34 years ago, in 1966, and amended the law in 1974 to establish the current notification and remedy provisions. In brief, the law provides that if a manufacturer decides that one of its products contains a defect that relates to motor vehicle safety, the manufacturer must notify the agency and owners and provide a remedy at no cost to the owners.

When the agency screening process identifies a possible safety defect, our Office of Defects Investigations takes steps to open an investigation as a preliminary evaluation. We inform the manufacturer and the public at this time. If our review of the information at the end of the preliminary evaluation suggests that further evaluation is warranted, we move the investigation to a second stage, the engineering analysis (EA), and we are in that stage today. At this point we conduct a more detailed analysis, including appropriate inspections, tests, surveys and additional information from the manufacturer. After the EA phase of the investigation, additional steps may ultimately lead the Administrator to decide that a defect exists and to order the manufacturer to recall. If necessary, the agency will then go to court to enforce that order. Our investigation of Firestone has reached the EA stage, the engineering analysis phase.

Firestone originally began producing the tires under investigation in 1991. By the end of 1999, approximately 47 million had been produced. By that time NHTSA had received 46 reports, but they were scattered over 9 years, about incidents involving these tires. The tires were on a variety of vehicles, primarily, though, on Ford Explorers. In view of the large number of tires that have been produced and the variety of possible causes of tire failure and the fact that all types of tires can fail and do in use, the reports we received did not warrant opening a defect investigation at that time.

Furthermore, the informal submission by State Farm in 1998 of 21 claims also were over a period of several years, almost 8 years, and that also did not warrant at that time initiating an investigation.

The situation changed rapidly following the airing of a news story by KHOU in Houston. That was on February 7, 2000, and that dramatized the question of the tire safety. In addition to highlighting two fatalities, the story alluded to a number of other crashes and fatalities. Upon learning of the KHOU story, we contacted the station to obtain more details. They have not given us the information we have requested, but the growing publicity generated other reports to us, including several provided by other media outlets and by plaintiffs' attorneys as well. Over the next few weeks we were able to verify many of these reports.

We opened a preliminary evaluation on May 2. At that time the agency was aware of 90 complaints. They had nearly doubled in that time, including a report of 33 crashes and 4 fatalities. Information continued to accumulate rapidly as a result of the investigation and attendant publicity. By August 1, we had 193 complaints alleging tread separations on these tires with 21 reported fatalities. In a meeting on August 4, we suggested that Firestone recall the tires. On August 9, Firestone announced it would recall 14.4 million tires. As of August 31, we have had 1,400 complaints with reports of 88 fatalities and 250 injuries.

NHTSA is continuing its investigation to determine whether additional tires need to be recalled. If we discover information that indicates a problem in any other tire we will move promptly to urge Firestone to expand the recall. They are closely monitoring the recall to ensure that Ford and Firestone promptly replace all of the defective tires. Our review of the data from Firestone has already disclosed that other tire models and sizes of the tires under investigation have rates of tread separation as high or higher than the tires that Firestone is recalling.

Therefore, on August 30 I recommended to Firestone that it expand its recall to include those tires. When Firestone declined to expand the recall, we felt it necessary to issue a consumer advisory on September 1 to advise owners of these tires so they could take actions to ensure their safety. We now know that in September 1999 Ford asked Firestone to replace Wilderness tires mounted on Ford Explorers that had been sold in states around the Arabian Gulf. Similar actions were taken in other countries as well. Ford would have been required to notify NHTSA of such an action if it had occurred in the United States, but our regulations do not apply to actions taken outside of the United States. Ford thus had no obligation to advise NHTSA when it took these actions.

If we find that we need additional legislative authority to require manufacturers to provide in the future such information, we will seek to obtain it. A number of claims and several lawsuits have been filed against Ford and Firestone before we became aware of any trend that indicated a potential defect. Our current regulations do not require the manufacturers to give us information about claims or litigation. We are also therefore exploring measures which would allow us to track claims and litigation information on a routine basis.

Mr. Chairman, I want to assure you that this investigation is the highest priority in NHTSA, and we will remain focused on the investigation and closely monitor the recall. Thank you for holding this hearing, and I will be glad to answer any questions.

[The prepared statement of Hon. Sue Bailey follows:]

PREPARED STATEMENT OF HON. SUE BAILEY, ADMINISTRATOR, NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION

Mr. Chairman and Members of the Committee: I am pleased to appear before you this morning to address the investigation and recall of Firestone ATX, ATX II and Wilderness AT tires. This is the first subject on which I have appeared before Congress as Administrator of the National Highway Traffic Safety Administration (NHTSA), and I welcome the opportunity to address this important issue.

The agency's mission is to prevent deaths and injuries in motor vehicle crashes. Our program to investigate safety defects is a key part of that mission. I will give you a quick overview of the agency's authority to investigate safety defects, describe the procedures that the agency follows in its investigations, outline the Firestone investigation in that context, and share with you some of my observations about the investigative process.

OVERVIEW

First, our authority: Congress passed the basic motor vehicle safety law 34 years ago, in 1966, and amended the law in 1974 to establish the current notification and remedy provisions. In brief, the law provides that if a manufacturer decides that one of its products contains a defect that relates to motor vehicle safety, the manufacturer must notify the agency and owners and provide a remedy at no cost to the owners. When the defect is in a tire sold as original equipment on a new vehicle, the tire manufacturer is the responsible manufacturer, as opposed to the vehicle manufacturer, and the remedy may either be to repair or replace the tire.

The law gives us authority to investigate possible defects, to decide whether a defect exists, and to order a manufacturer to provide a remedy for any defect. If a manufacturer refuses to provide a remedy, the law authorizes us to go to court to compel it to do so. This is seldom necessary. In all but very rare cases, manufacturers agree to remedy the defect without our having to reach a final decision. In a typical year, we open between 80 and 100 defect investigations, of which more than half result in recalls. In addition, manufacturers conduct an average of 200 defect recalls each year that are not influenced by NHTSA investigations.

INVESTIGATIVE PROCEDURES

We receive complaints from a wide variety of sources about possible defects in motor vehicles and motor vehicle equipment. The sources include our toll-free consumer hotline, our web page, e-mail, phone calls, and letters. We enter all complaints into a database which is continuously screened by a team of five investigators in the agency's Office of Defects Investigation (ODI) to identify potential defect trends. In an average year, we receive between 40,000 and 50,000 complaints from these sources.

When the screening process identifies a potential problem, ODI takes steps to open an investigation as a "Preliminary Evaluation" (PE). We inform the manufacturer and the public at this time, and begin the process of gathering information from the manufacturer and other appropriate sources. We give the manufacturer an opportunity to present its views. Preliminary Evaluations are generally resolved within four months from the date of their opening. They may be closed if we determine that further information is not warranted, or if the manufacturer decides to conduct a recall.

If our review of information at the end of a PE suggests that further investigation is warranted, we move the investigation to a second stage, the Engineering Analysis (EA), in which we conduct a more detailed and complete analysis of the character and scope of the alleged defect. The EA supplements the information collected during the preliminary evaluation with appropriate inspections, tests, surveys, and additional information from the manufacturer. ODI attempts to resolve all EAs within one year from the date they are opened.

At the conclusion of the EA, we may close an investigation because the additional information does not support a finding that a defect exists or because the manufacturer decides to conduct a recall. If ODI continues to believe that the data indicate a defect, the Associate Administrator for Safety Assurance may convene a panel of experts from the agency to review the information. The manufacturer is notified that a panel is being convened and of the panel's result, and is given an opportunity to present new analysis or new data.

If the panel concurs with ODI, the next step is to send a "recall request letter" to the manufacturer. If the manufacturer declines to conduct a recall in response to this letter, the Associate Administrator may issue an "Initial Decision" that a safety-related defect exists. An Initial Decision is followed by a public meeting, at which the manufacturer and interested members of the public can present information and arguments on the issue, as well as written materials. The entire investigative record is then presented to the NHTSA Administrator, who may issue a "Final Decision" that a safety defect exists and order the manufacturer to conduct a recall. If necessary, the agency will then go to court to enforce such an order.

THE FIRESTONE ATX/WILDERNESS RECALL

With this description of our investigative procedures as context, I will turn now to the Firestone investigation.

Firestone originally began producing the tires under investigation in 1991. By the end of 1999, approximately 47 million had been produced. By that time, NHTSA had received 46 reports scattered over 9 years about incidents involving these tires. The tires were on a variety of vehicles, primarily on Ford Explorer sport utility vehicles. In view of the large number of tires that had been produced, the variety of possible causes of tire failure (road hazards, excessive wear, etc.), and the fact that all types of tires can fail in use, the reports that we received did not indicate a problem that would warrant opening a defect investigation regarding these tires. The informal submission by State Farm in 1998 of 21 claims over an eight-year period also did not provide such an indication.

The situation changed rapidly following the airing of a news story by KHOU in Houston on February 7, 2000, that dramatized the question of the tires' safety. In addition to highlighting two fatalities, the KHOU story alluded to a number of other crashes and fatalities.

Upon learning of the KHOU story, we contacted the station to obtain more details about the incidents. They have not given us the information we requested, but the growing publicity generated other reports to us, including several provided by other media outlets and by plaintiffs' attorneys. Over the next few weeks, we were able to verify many of these reports. We opened a Preliminary Evaluation on May 2. At that time, the agency was aware of 90 complaints, including reports of 33 crashes, and 4 fatalities. On May 8 and 10, we sent Ford and Firestone extensive Information Requests asking for information about the tires. At that point NHTSA began a constant communication with both companies, which continues today.

Information accumulated rapidly as a result of the investigation and attendant publicity. By August 1, we had 193 complaints alleging tread separations on these tires, with 21 reported fatalities. In a meeting on August 4, we suggested that Firestone consider recalling the tires. By August 9, when Firestone announced that it was recalling the ATX and ATX II tires, and Wilderness AT tires produced at its Decatur, Illinois, plant, we had over 300 complaints, with 46 reported fatalities. The number has continued to grow. As of August 31, we have 1400 complaints with reports of 88 fatalities and 250 injuries.

Firestone has recalled all of the ATX and ATX II tires of the P235/75R15 size manufactured since 1991. It has also recalled Wilderness AT tires of that size made at its Decatur, Illinois, plant, for a total of 14.4 million tires out of the 47 million tires covered by our investigation. Firestone estimates that approximately 6.5 million of the 14.4 million tires included in the recall are still on the road. Ford and Firestone are taking a number of measures to provide replacement tires.

NHTSA is continuing its investigation to ensure that the scope of the recall is proper and that all unsafe tires are recalled. At our request, Firestone and Ford have given us voluminous information about the tires, and we have sent follow-up requests for additional information to both companies and to Goodyear Tire and Rubber Company, for a peer comparison. We are continuing to monitor the recall to ensure that all defective tires are replaced promptly.

Our review of data from Firestone has already disclosed that other tire models and sizes of the tires under investigation have rates of tread separation as high or higher than the tires that Firestone is recalling. On August 30, we recommended to Firestone that it expand its recall to include these tires. When Firestone declined to expand the recall, we issued a consumer advisory on September 1 to advise owners of these tires to take actions to assure their safety.

OBSERVATIONS

We now know that in September 1999 Ford conducted a campaign (referred to by Ford as an “Owner Notification Program”) to replace Wilderness tires mounted on Ford Explorers that had been sold in the states around the Arabian Gulf (primarily Saudi Arabia). Similar actions were taken in Venezuela in May 2000 and in Columbia, Ecuador, Malaysia, and Thailand. Ford would have been required to notify NHTSA of such an owner notification program if it had occurred in the United States, but our regulations do not apply to actions taken outside the United States. Ford thus had no obligation to advise NHTSA when it took these actions. If we find that we need additional legislative authority to require manufacturers to provide such information, we will seek to obtain it.

A number of claims, and several law suits, had been filed against Ford and Firestone before we became aware of any trend that would indicate a potential defect. We received no information about those events from the companies or from the plaintiffs’ attorneys. Our current regulations do not require the manufacturers to give us information about claims or litigation. The existing law gives us broad authority to seek information from vehicle and equipment manufacturers during the course of an investigation. We are exploring measures that would allow us to track claims and litigation information routinely.

Mr. Chairman, I want to assure you that this investigation is the highest priority in NHTSA. We will remain focused on the investigation, closely monitor the current recall campaign, and seek any expansion of the campaign that may be necessary.

Mr. Chairman, I want to conclude by expressing my thanks to you for holding this hearing. I will be glad to answer any questions you may have.

Mr. TAUZIN. The Chair thanks you, Dr. Bailey, and recognizes himself for 5 minutes under our rules.

Dr. Bailey, who made the decision in July 1998 that the report submitted by the State Farm representative, Mr. Boyden, did not merit further review?

Ms. BAILEY. That was part of the analysis that was done by that individual. Again to put that into context——

Mr. TAUZIN. What individual?

Ms. BAILEY. The individual that received the complaints.

Mr. TAUZIN. Who was that individual?

Ms. BAILEY. I don’t have the name. But I do know—we are aware of the name, and I can provide that for you.

Mr. TAUZIN. So there was an individual who reviewed the memo from State Farm and made a decision that it did not warrant further review?

Ms. BAILEY. Correct.

Mr. TAUZIN. And you have the name of that individual but you don't have it with you. Does someone else have the name of that individual?

Ms. BAILEY. I will see if we can pull the memo right now. If not, we will provide it for the record.

It is Steve Beretsky.

Mr. TAUZIN. I think you probably are going to need to supply that name to the clerk so we have it properly spelled.

Mr. TAUZIN. Was a written decision rendered in that matter not to further review the report issued by State Farm to your office?

Ms. BAILEY. There was a memo at the time, and I think that should also be placed in the record. It was filed. It was analyzed, and there is a written report.

Mr. TAUZIN. Do we have a copy of that memo and written report?

Ms. BAILEY. I believe you do, but we will place it in the record.

Mr. TAUZIN. We do not have that report and would request that you make it available to us.

Ms. BAILEY. We will provide that.

Mr. TAUZIN. Does the agency have any records of the phone calls that Mr. Boyden will testify he placed to the agency in 1999?

Ms. BAILEY. There is no record of those phone calls.

Mr. TAUZIN. Had the agency decided to do something in regards to the memorandum that was sent to you in July 1998, what could the agency have done?

Ms. BAILEY. They could have begun an initial assessment. I would like to put that into context, however, that over that 6-year period the population of tires produced was over 40 million and so you can see over those years there were 2 or 3 per year in terms of the complaints.

Mr. TAUZIN. I am not asking whether it was a good decision. I will leave that to the judgment of others. Had your agency made a decision to proceed to begin seeking information as to these claims that Firestone was obviously receiving for these tire failures, what could you have done?

Ms. BAILEY. Begun an initial assessment.

Mr. TAUZIN. An initial investigation could have started as early as July 1998 based upon that memo had someone in your office decided it was worth checking?

Ms. BAILEY. If there were a trend indicated by the data, we could have started an initial assessment.

Mr. TAUZIN. So you have the authority to do that today and you could have done that in July 1998 had a different decision been made about Mr. Boyden's e-mail; is that correct?

Ms. BAILEY. That's correct.

Mr. TAUZIN. I want to turn to the issue of testing. In our interviews with your official, apparently George Isadou, Division Chief of the Office of Crash Avoidance, we inquired as to whether or not NHTSA required testing of tires under speed conditions. We were told that there was an endurance test ordered at 50 miles per hour for 1,700 miles at 26 pounds per square inch, and that another test is the high speed test and that is ordered for 70, 75, and 80 miles, but only at 32 pounds per square inch.

Ms. BAILEY. That is correct, and at 95 degrees.

Mr. TAUZIN. The agency orders testing at 32 pounds per square inch for speed testing, but not at 26 pounds per square inch. Why?

Ms. BAILEY. That is——

Mr. TAUZIN. Why, when Ford is instructing its customers to inflate its tires at 26, is the agency only ordering testing at 32?

Ms. BAILEY. That is the current tire standard testing. And that is one of the things clearly that we need to review and it is being updated at this time. In fact——

Mr. TAUZIN. So that in this case, I want to get it for the record, when these tires were produced for this car in 1990, there was no instructions, there was no standard, there was no requirement by NHTSA for either Ford or Firestone to test these tires under speed test conditions at 26 pounds per square inch; is that correct?

Ms. BAILEY. There was a standard and in fact they passed an endurance and high speed test in 1997. But you are correct about the pounds per square inch.

Mr. TAUZIN. But it was 32 pounds per square inch.

Ms. BAILEY. Exactly.

Mr. TAUZIN. So there is not a requirement today by NHTSA on these tire or auto manufacturers to test the tires on the vehicles under real conditions at the pounds per square inch that they in fact were recommending to their customers, 26 pounds per square inch.

Ms. BAILEY. At this time there is not.

Mr. TAUZIN. Is the agency moving to change that?

Ms. BAILEY. Yes, we are.

Mr. TAUZIN. The Chair's time has expired. The gentleman from Massachusetts is recognized for 5 minutes.

Mr. MARKEY. Thank you. I begin by asking unanimous consent to include in the record two charts. The first outlines NHTSA's overall funding and shows that, inflation adjusted, a 35 percent decrease in their budget since 1980.

The second chart shows the funding for the defects investigation programs of NHTSA which received $2.2 million in 1980 and even though the request in the year 2000 from the administration was 3.7 million this Congress only provided 2.6 million for that program. Again an adjustment for inflation, there has actually been a decrease in that program as well notwithstanding the numbers, Mr. Chairman, you earlier indicated.

Mr. TAUZIN. The gentleman's charts are admitted into the record.

Mr. MARKEY. I thank you very much. Again, even looking at that area, the area that deals with tires, that particular unit of NHTSA may not have uncovered a defect as Firestone has yet to identify a defect again, only a high rate of claims against its tires. It is the overall agency funding that we should be looking at to make sure that they have the resources to look at every problem. And let me ask you, Ms. Bailey, the SUVs have different variables to bear upon tires than the smaller economy tires do. They are advertised as off the road vehicles, driving up mountains, through the streams. These ads make these vehicles seem as though you can take them anywhere. On highways the SUVs have been noted to have a proclivity to roll over. Are we testing these tires for the right conditions? Does NHTSA need to subject these tires to a different, more rigorous standard because they are intended for SUVs and are advertised for use beyond that which an ordinary automobile would be used?

Ms. BAILEY. I would agree with that and in fact we have begun work on the updating of the tire standards. We are going to have a proposal out in the spring, and we have asked for suggestions from the manufacturers themselves, which I think would address that issue, and they are to be in in October of this year.

Mr. MARKEY. Have your tire standard tests changed since 1968?

Ms. BAILEY. The tire standards clearly need updating. They originally started 30 years ago, and we have not had an update since 1968.

Mr. MARKEY. So the test we use today is a 32-year-old test even though SUVs are advertised for off the road and when they come back on the road may have been subjected to ordinary conditions that ordinary tires would not have been?

Ms. BAILEY. Exactly. That is part of the reason why we would want to update these standards.

Mr. MARKEY. I think the driving public in America deserves a new test.

NHTSA has proposed a rollover test and a reporting requirement on rollovers. Do you agree that the results of such testing should be made available to consumers so that it is in their hands at the showroom?

Ms. BAILEY. I believe that we should have a rollover rating system that would be available to consumers, yes.

Mr. MARKEY. So the information is available at NHTSA in its files with the showroom, but the consumer does not have access to it?

Ms. BAILEY. That's correct.

Mr. MARKEY. Will NHTSA ensure that from now on consumers can see it at the showroom so that they can know what the safety record is?

Ms. BAILEY. Currently as part of the budget we are blocked. While there is a study of the rollover rating system, I would like to see that set aside and be allowed to move ahead with a rating system that would be available to the consumer.

Mr. MARKEY. I think that every family purchasing one of these vehicles should know what the danger is and it should not be some hide and seek game with the automobile manufacturer or dealer that requires them to be trying to intrude into the private dealings of the automobile salesman. At the same time they may be trying to get a discount in the price.

Finally, Ms. Bailey, the Venezuelan Consumer Protection Agency has recommended bringing criminal charges against Firestone and Ford. Are you in touch with your counterparts in Venezuela?

Ms. BAILEY. Could I just back up one moment and be sure that we have in the record that the Senate included in its version of the fiscal year 2001 DOT appropriation bill language that actually prohibits us from establishing a rollover rating system. I would appeal to the Senate in the interest of the seriousness of the work we are doing here today to set that aside so we can do that rating system. I want to be clear about that.

Mr. MARKEY. I don't think that there is a more important public safety issue than reversing what the Senate has already done in trying to prohibit you from ensuring that all consumers know what the danger is in driving these SUVs.

On to the Venezuela question.

Ms. BAILEY. We have not been in direct contact with Venezuela. We have been in contact with many of the other countries through the embassies and through our safety counterparts to obtain information about the replacements or quote/unquote, recalls that were done in other countries.

Mr. MARKEY. Do they have documents from American companies which you do not have? Other foreign authorities?

Ms. BAILEY. I am not aware of that.

Mr. TAUZIN. The Chair recognizes the chairman of the Subcommittee on Oversight Investigations, Mr. Upton.

Mr. UPTON. Thank you, Mr. Chairman.

Ms. Bailey, thank you for being with us this afternoon.

Do you believe that NHTSA has the appropriate authority to receive information from the tire manufacturers? Or do you need more?

Ms. BAILEY. We have authority to receive information from manufacturers, and are doing so as part of our investigation. That authority may not extend—does not extend, as you know, to incidents that occur in other countries.

Mr. UPTON. But at least for domestic use, you believe that you have got—the pipelines are open and you are getting the information that you need?

Ms. BAILEY. I would add one other thing. That is clearly if we have information about some of the claims that at this point we do not have the authority to obtain, that could have been beneficial in this case.

Mr. UPTON. I raise that because in your testimony you said as of May 2, at that time the agency was aware of 90 complaints, including the reports of 43 crashes and 4 fatalities, and yet on the chart Firestone alone in 1999 it is not 90 complaints, it is 772 complaints.

Ms. BAILEY. That is because those are claims versus the complaints that we get, so that information is what I am referring to, and I say that we need to look at our ability to collect data from the manufacturer in regard to claims. We would be looking through our—expanding our current regulatory capability, but if need be we would also be looking at other ways in which we can obtain the data that you see there.

Mr. UPTON. In a Washington Post story that ran a couple of weeks ago, Ken Weinstein, your Associate Administrator for Safety Assurance, says, and this is not in quotes, but the story reads as part of its investigation the agency has requested information from Goodyear Tire and Rubber on similar tires. Have you received that information in the couple of weeks that you have asked for it?

Ms. BAILEY. My colleagues tell me it is due September 15. I know it has been requested. That is an essential part of our investigation to look at comparable or peer material.

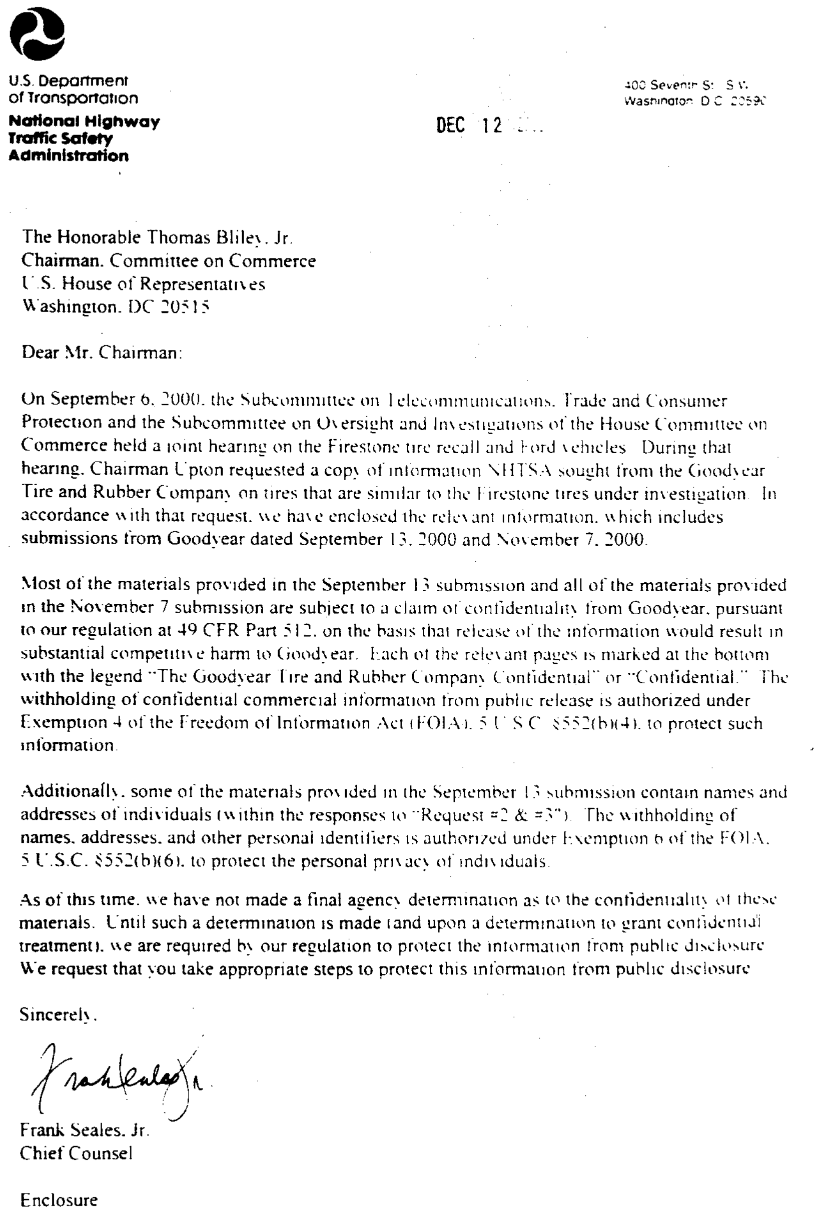
Mr. UPTON. Are you looking beyond Goodyear as well?

Ms. BAILEY. The only request that we have at this time is for Goodyear.

Mr. UPTON. Would you be able to furnish the committee their response when you receive it?

Ms. BAILEY. Yes, sir, we would.

[The following was received for the record:]



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

400 Seventh St. S.W.
Washington D.C. 20590

DEC 12 [illegible]

The Honorable Thomas Bliley, Jr.
Chairman, Committee on Commerce
U.S. House of Representatives
Washington, DC 20515

Dear Mr. Chairman:

On September 6, 2000, the Subcommittee on Telecommunications, Trade and Consumer Protection and the Subcommittee on Oversight and Investigations of the House Committee on Commerce held a joint hearing on the Firestone tire recall and Ford vehicles. During that hearing, Chairman Upton requested a copy of information NHTSA sought from the Goodyear Tire and Rubber Company on tires that are similar to the Firestone tires under investigation. In accordance with that request, we have enclosed the relevant information, which includes submissions from Goodyear dated September 13, 2000 and November 7, 2000.

Most of the materials provided in the September 13 submission and all of the materials provided in the November 7 submission are subject to a claim of confidentiality from Goodyear, pursuant to our regulation at 49 CFR Part 512, on the basis that release of the information would result in substantial competitive harm to Goodyear. Each of the relevant pages is marked at the bottom with the legend "The Goodyear Tire and Rubber Company Confidential" or "Confidential." The withholding of confidential commercial information from public release is authorized under Exemption 4 of the Freedom of Information Act (FOIA), 5 U.S.C. §552(b)(4), to protect such information.

Additionally, some of the materials provided in the September 13 submission contain names and addresses of individuals (within the responses to "Request #2 & #3"). The withholding of names, addresses, and other personal identifiers is authorized under Exemption 6 of the FOIA, 5 U.S.C. §552(b)(6), to protect the personal privacy of individuals.

As of this time, we have not made a final agency determination as to the confidentiality of these materials. Until such a determination is made (and upon a determination to grant confidential treatment), we are required by our regulation to protect the information from public disclosure. We request that you take appropriate steps to protect this information from public disclosure.

Sincerely,

Frank Seales Jr.

Frank Seales, Jr.
Chief Counsel

Enclosure

Mr. UPTON. It is my understanding that there is—the FARS, the Fatalities Accident Reporting System, that contains all vehicle related fatalities as required by law. And at the end of 1998 that data base contained 29 fatalities from accidents in a Ford Explorer fitted with Firestone ATX, ATX II or Wilderness tires. I am a little bit surprised that with all of the attention which has been focused on this issue the last number of months that the 1999 data base is not yet available. It is only through 1998.

Ms. BAILEY. It should be available within the next 2 weeks.

Mr. UPTON. We are almost in fiscal year 2001.

Ms. BAILEY. It should be available within the next 2 weeks.

Mr. UPTON. Do you think that will be helpful in determining whether or not there are some problems with the tires?

Ms. BAILEY. I think that information is very helpful, but it is more helpful for the purposes of the defects investigation that we are—have undertaken—that we look at the other ways in which the data base can be expanded.

Mr. UPTON. In looking at some testimony that was before this subcommittee back in the seventies with regard to the Firestone 500 tire recall——

Ms. BAILEY. Yes.

Mr. UPTON. [continuing] it was noted in that testimony by then, I think it was Chairman Moss that, as a part of the investigation, had directed a number of inquiries to Firestone, Firestone filed objections to releasing that information. In fact, in the conclusion, it indicated that NHTSA may exercise full subpoena power to obtain and retain documents and information that are required to determine whether safety defects exist.

I was not eligible to run for Congress when this happened but it was—involved again the Decatur facility. Did—has NHTSA, despite all its testimony 20 some years ago, has NHTSA had follow-through with the Decatur facility over the last 20 years at all?

Ms. BAILEY. To my knowledge, it has not been focused on Decatur, no.

Mr. UPTON. The last thing I guess before my time expires, there's been a real difference between the warranty claims with the tires as well as the number of deaths associated with the accidents. How is it that we can do a better job at getting NHTSA to get both claims and warranty, both accidents as well as claims reported routinely to NHTSA as you look at future recalls or future instances of problems?

Ms. BAILEY. Well, we feel that we may have within our current statutory authority the ability to expand so that we're able to obtain the claims that would be helpful. We're going to explore that. Obviously, that's a major issue for us.

Mr. UPTON. My time has expired.

Mr. TAUZIN. I thank the gentleman. The Chair now recognizes for his 5 minutes the ranking minority member of the full committee, Mr. Dingell.

Mr. DINGELL. Mr. Chairman, I thank you. You have been very gracious.

Your statement says that Ford had no obligation to inform NHTSA of the recall in Saudi Arabia and other countries last year.

Am I correct in assuming that NHTSA believes manufacturers should be required to notify NHTSA of foreign recalls?

Ms. BAILEY. There was no obligation for them to do so in the past, but at this time I think it's worth exploring, clearly worth exploring what we can do in a global marketplace to exchange valuable information about safety.

Mr. DINGELL. Do you plan to request new authority to accomplish this purpose?

Ms. BAILEY. I plan to explore what is within our current capability and, yes, additional statutory remedy, if need be.

Mr. DINGELL. Now, did NHTSA ever upgrade motor vehicle safety standard number 109 as the committee report suggested back in 1978?

Ms. BAILEY. The answer is no.

Mr. DINGELL. Could you tell us why NHTSA did not upgrade that standard?

Ms. BAILEY. The FMVSS 109 was last amended in July 1999 to require a four-digit date code instead of the original three-digit date code. The four-digit date code indicates the week of the year of the production in the first two digits and the year of production in the last two. For example, the date code 4599 indicates the tires were produced in the 45th week of 1999. Several minor amendments such as labelling requirements have been made to the standard over the years.

Mr. DINGELL. Now, but why did you not upgrade that standard? Could you submit that for——

Ms. BAILEY. I can submit that for the record. I don't have an answer, sir.

Mr. DINGELL. All right. Now NHTSA's tire safety standards has not been revised since when?

Ms. BAILEY. 1968.

Mr. DINGELL. Can you explain to us whether NHTSA is considering upgrading that standard at this time?

Ms. BAILEY. We are clearly considering upgrading the standard and have begun the process. We will have a proposal out in the spring, but that is where it currently stands. Given the situation, I will be looking to expedite that sooner.

Mr. DINGELL. All right. NHTSA is trying to cope with a much larger and more complex regulatory burden than it had in 1978, but your budget now is approximately one-third of that which you had at that time; is that correct?

Ms. BAILEY. That is correct.

Mr. DINGELL. Now, how is that affecting the ability of NHTSA to carry out its responsibilities?

Ms. BAILEY. I do not believe it has affected our ability to carry out this administration. However, up to this point——

Mr. DINGELL. You are having significant problems, are you not, in terms of addressing all of the concerns you might have? For example, your able to investigate the matters with regard to the Firestone tires at this time. Are you able, however, to catch these things early enough? Remember, this thing has been going on for approximately 2½ or 3 years. So am I fair in inferring that it has, in fact, impacted the ability of NHTSA to address questions of this kind?

Ms. BAILEY. I think the regulatory authority to obtain data on a worldwide basis, for instance, or to obtain claims data has affected our ability to identify the need for an investigation in this case earlier, but it does not necessarily the funding.

Mr. DINGELL. And your problems with inadequate funding have compounded this problem, have they not?

Ms. BAILEY. Clearly, funding is an issue when you are working in an administration with this kind of responsibility. We want to be adequately funded, and again, that is why we are looking for that million dollars difference between—in this year's budget so that we are adequately funded in the office of defects investigation.

Mr. DINGELL. Am I fair, then, in inferring that you are telling me you have adequate moneys to carry forward all of your responsibilities or that you do not?

Ms. BAILEY. Well, there is a proposal before Congress today, the President's budget is asking for, again, a million dollars above what—an additional million dollars so that we can carry out our mission, and so I'm hoping that we would be funded at that level.

Mr. DINGELL. Thank you. Thank you, Mr. Chairman.

Mr. TAUZIN. I thank the gentleman. Before I recognize the chairman of the full committee, I would ask unanimous consent of the committee to have some time out of order to correct the record.

Without objection, Ms. Bailey, in answer to questions I asked you relative to the memo—the e-mail that was received by your—by NHTSA in July 1998, you indicated that an analysis was done and a memo was prepared indicating that it did not deserve or require further retention or action. I am told—I think you're being informed of it now—that that was an incorrect statement. There was no such memo prepared, no written analysis done in 1998; that there was something done in August of 2000. Would you like to correct the record since you are under oath?

Ms. BAILEY. Exactly. Apparently, and I have read that memo, but the memo that I read was created in August of 2000.

Mr. TAUZIN. So the only memo——

Ms. BAILEY. There was an analysis done by that individual whose name I gave you but apparently no written report at that time.

Mr. TAUZIN. Ms. Bailey, I would ask you to perhaps consult with, again, representatives of your office. We received very different testimony in interviews with the gentleman in question. I will be specific. The gentleman in question informed our investigators that he did not recall receiving the e-mail nor doing an analysis of it. Is that correct or incorrect?

Ms. BAILEY. You're saying that Mr. Beretsky says that he did not receive an e-mail?

Mr. TAUZIN. He did not recall receiving an e-mail nor recall doing any analysis, no memos on it. Would you consult again—I realize you've been on the job for 3 weeks and we've got a problem here.

Ms. BAILEY. Apparently, and I've read a memo that discusses in detail what the claims said, which is what led me to believe that that memo—the internal memo led me to report to you the internal memo in which it says it was noticed, and I saw the memo and I saw the statistics. So I know it came in the e-mail. I have seen the e-mail. Apparently you're correct that Mr. Beretsky says he does not recall it and that he is reconstructing now—we are reconstructing the series of events. I was not aware that he had said he did not recall it. I only had the opportunity to read the memo which, again, has the statistics that says they noticed the claims.

Mr. TAUZIN. So we have the record correct and complete, the information we have is that there was no written memo, no written analysis done in 1998 of the State Farm insurance memo from Mr. Boyden, that a memo was constructed in August of 2000 just last month by someone in your agency trying to reconstruct the situation. That is the memo you referred to. There is no such memo of 1998; is that correct?

Ms. BAILEY. There's not one in 1998. The part that I would like to reinvestigate is the memo that I read, which had the statistics and reported the complaints. We do have that, but apparently this is a reconstruction, too.

Mr. TAUZIN. That is a reconstruction memo. So that, as far as we know, the e-mail that was received by your agency was placed in a file, and as far as we know and as far as Mr. Beretsky could tell us, there was no recollection of even receiving it, much less analyzing it; is that correct?

Ms. BAILEY. Yes, sir.

Mr. TAUZIN. I thank the gentlelady. The Chair now recognizes the gentleman from Virginia.

Chairman BLILEY. I have no questions at this time.

Mr. TAUZIN. The Chair will then move to—I recognize the gentleman from Michigan, Mr. Stupak.

Mr. STUPAK. Thank you, Mr. Chairman.

Ms. Bailey, NHTSA does not have standards for tire strength for steel belted radial tires, correct?

Ms. BAILEY. Who am I talking to?

Mr. STUPAK. Over here. I know there's a lot of us from Michigan. You don't have any standards for steel belted radial tires, correct?

Ms. BAILEY. There is not a separate standard.

Mr. STUPAK. The last standard was 1968?

Ms. BAILEY. Correct.

Mr. STUPAK. All right. So when you speak of endurance tests, high speed tests at 95 degrees, what standard is that based upon? Whose standard is that, to give a tire your approval?

Ms. BAILEY. That was based on the original testing that was—of the standards for testing from 1968.

Mr. STUPAK. So when we do a testing as to the endurance of a tire, any tire, it's based upon a 1968 standard; is that what you're testifying?

Ms. BAILEY. Exactly. I can tell you what it is. It's between 75 and 85 miles an hour. It's at 95 degrees. It's at 32 pounds per square inch, and it's with a load of 88 percent of the maximum load, but yes, it's a 1968 standard and clearly needs to be updated.

Mr. STUPAK. But yet in 1978, after a lengthy investigation by this committee on tread separations on those Firestone 500 tires, the committee concluded that the standard for the past year's tires was inadequate to protect public safety, the standard that was adopted in 1968. As I said, did NHTSA ever upgrade this standard as the committee suggested in 1978?

Ms. BAILEY. It is my understanding that there was a proposal to upgrade at that time, and that when there were cutbacks in the 1980's, that that was withdrawn.

Mr. STUPAK. Okay. In 1978—I'm not trying to beat a dead horse—but in 1978, the Society of Automotive Engineers adopt ed a paper that concluded that 27 percent of the vehicles they studied had tires that were underinflated by 4 to 16 pounds per square inch. That was a major safety issue. Is that still true today?

Ms. BAILEY. I would need to provide that for the record. I am not aware—I could not answer that definitively.

Mr. STUPAK. Okay. In 1978, after receiving that report from the Society of Automotive Engineers , NHTSA said it was going to require a low pressure—excuse me, require a low pressure warning system on vehicles.

Ms. BAILEY. Yes.

Mr. STUPAK. Do you know what happened to that initiative?

Ms. BAILEY. My understanding is that that proposal, again, was set aside with the cutbacks in the 1980's.

Mr. STUPAK. Okay. If the recommended tire pressure means that the tire will not perform to its tire speed rating, does NHTSA or any other government agency have the authority to take action, in other words, order a recall?

Ms. BAILEY. In order to order a recall, you need to go through—to order one, a mandatory recall, you would need to have gone through a complete investigation. It would not be from failure of one tire standard test.

Mr. STUPAK. Okay. But if the recommended tire pressure means a tire will not perform to tire speed rating, that is the standard set, the tire speed rating that they give to this tire, if it is not performing to that standard, what authority do you have then, NHTSA or any other government agency, to recall that tire? What I'm driving at is how do we get these things off the road if they're not meeting the standards?

Ms. BAILEY. Well, the answer I gave earlier is the correct one, but I think the important thing here is that you're absolutely right, the standards are not appropriate, the tire testing standards. They are not long enough in endurance, they're not at the right pressure per square inch, they are not at the right temperature so that we would have identified problems with these particular tires because in fact they passed in 1997. So we need to update the tire standard itself.

Mr. STUPAK. Okay. In response to a question from Chairman, Mr. Tauzin, you said the speed test is at 95 degrees—95 degrees, 32 pounds per square inch. That is the current standard, and that passed the endurance and speed test at 32 psi, but not the recommended 26 psi. The 26 psi would make it 6 pounds under your recommended standard. So then going back to your automotive safety engineers report, 1978, that would be a major, to use their words, a major safety issue, would it not?

Ms. BAILEY. Your question is if they passed the test as it was set up?

Mr. STUPAK. At the 32 pounds.

Ms. BAILEY. Right.

Mr. STUPAK. Okay. And then that is what you said in response to Mr. Tauzin's questions, it passed the endurance and speed test at 32 pounds, not the recommended 26 pounds, that 6-pound difference there in a tire, and according to the Society of Automotive Engineers paper, which conclude that 27 percent of the vehicles they studied had tires that were underinflated by 4 to 16 psi's, and that this is a major safety issue. So running these tires that were tested at 32 with the recommendation it's at 26, do you agree then that that would be a safety issue?

Ms. BAILEY. There are two issues here. Yes, it would be a safety issue, and that is an education aspect to maintaining appropriate psi in your tires.

The second point would be that the 26 is what is recommended, my understanding, of the Ford Explorer, but not what the Firestone recommendation is, and we would have been testing the tires according to the Firestone recommendation.

Mr. STUPAK. Would you be testing it not at the Firestone, but your recommendation which was 32?

Ms. BAILEY. At 32, but you're saying they were at 26 and that's the Explorer recommended psi.

Mr. STUPAK. Correct. Correct.

Mr. TAUZIN. The gentleman's time has expired. The gentlelady wishes to respond further?

Ms. BAILEY. Can I add one thing?

Mr. STUPAK. Yes.

Ms. BAILEY. Apparently, the endurance test itself is at 26 and not at 32. So——

Mr. TAUZIN. If the gentleman will yield, the high speed test is not at 26. It's at 32.

Ms. BAILEY. Exactly.

Mr. TAUZIN. The gentleman's time has expired. The Chair will recognize the gentleman from Ohio, Mr. Oxley, for 5 minutes.

Mr. OXLEY. Thank you, Mr. Chairman.

Mrs. Bailey, one of the problems seems to be how connections are made, or at least I need to understand that, especially when we're dealing with large data bases. How does NHTSA frame information requests so that it receives meaningful information and doesn't squander time on large amounts of information that have no particular bearing on the inquiry? How are you able to focus the information given the large data base, and apparently the information coming from other quarters? How are you able to focus in on your information requests so that you really get at the issue at hand? Do you have a policy or is that a seat of the pants operation?

Ms. BAILEY. The vast majority of our information comes from consumer reports, and there is a form that is filled out. You can obtain that on the Web page. It is taken directly through our auto hotline. So all the information is filled out in a way that is appropriate for our data base.

Mr. OXLEY. In this case, it seems that pieces of the puzzle were scattered among industry and agency data bases. Is there something wrong in NHTSA's structure and process that discourages information sharing? Do we put ourselves in a situation so that it's more adversarial than perhaps needs be and tends to discourage sharing of that kind of information?

Ms. BAILEY. I do not believe there's an adversarial quality to our information obtaining capability.

Mr. OXLEY. But the whole structure——

Ms. BAILEY. What we're missing is, again, global information in the worldwide marketplace. We're missing information about claims, and those are the two that we're going to be very focused on obtaining in the future.

Mr. OXLEY. And what are your plans then to upgrade that data base or upgrade your ability to get that information sooner rather than later?

Ms. BAILEY. It's really a regulatory question, our ability, our authority to expand information, acquisition, for instance, outside of the United States.

Mr. OXLEY. Do you have that authority now?

Ms. BAILEY. We feel we have within our regulatory capability that authority, but if we—if we indeed need statutory remedy, we will seek that .

Mr. OXLEY. And so you're not prepared at this point to say whether that needs a statutory remedy or not?

Ms. BAILEY. Not at this time.

Mr. OXLEY. What have NHTSA's priorities been in recent years, on the bread and butter auto safety issues or new programs? Can you tell me how many new programs NHTSA has undertaken over the last few years?

Ms. BAILEY. Well, the mission is to reduce injuries, save lives and lower health care and other costs. Clearly I think there have been real advances, because we have the safest highways we've had ever in the Nation's history. At the same time, yes, there are many new programs, some of which you know about, our buckle-up program, our reducing drinking and driving and a myriad of other programs that we would be happy to provide for the record.

Mr. OXLEY. And you don't feel that the emphasis on new programs is, in any way, detracted from your ability to deal with issues that we're talking about today?

Ms. BAILEY. No, sir, I do not.

Mr. OXLEY. And in your funding request over the years, the statistics would indicate that the appropriate part of your agency that deals with recalls and the like have been increased by some 50 percent; is that correct?

Ms. BAILEY. The funding?

Mr. OXLEY. Yes, for that particular——

Ms. BAILEY. It depends on whether you—that's in real dollars or not.

Mr. OXLEY. What is the staff of the division that handles the recalls in that particular area?

Ms. BAILEY. Our staff is at about 50—47, in fact.

Mr. OXLEY. Forty-seven people?

Ms. BAILEY. Yeah.

Mr. OXLEY. And do you think—are you in a position to say whether, in fact, that number is adequate or inadequate at this particular time?

Ms. BAILEY. I think we clearly need to, as we have done during this investigation, look at ways that we can increase our ability to meet our mission. We have reassigned staff and reallocated resources to cope with the intensity of this investigation, which is our highest priority in which we're looking to expedite. So clearly, funding is an issue for us and we're hoping that we will be funded appropriately by the Congress.

Mr. OXLEY. So you don't think that 47 people are in a position to handle this kind of an issue and deal with a recall of this magnitude?

Ms. BAILEY. I think we are at this point, but I believe we are going to need additional resources in the future to continue to deal with more vehicles on the road, complex technology, on issues like the one we are dealing with here today.

Mr. TAUZIN. Gentleman's time has expired. The Chair at this point would request unanimous consent for the documents contained in these two books, book one and book two, which have been agreed upon by both sides, would be submitted into the record subject to review by staff from both sides for confidentiality. Is there any objection? Without objection, so ordered.

Second, before we move on, I wanted, for public information, Ms. Bailey, I think we ought to take a moment to do this, indicate that at the Ford Web site, consumers can obtain information on the tires that are subject to the recall that you have encouraged Firestone to conduct and which they're currently conducting, and that information not only contains information about what is on your tire, but which of the tires that are—may be on your vehicle are, in fact, subject to recall and therefore replaceable under the recall, and I would encourage consumers who are tuning in to this hearing to take advantage of both contacts to your office and on the Ford Web site—I'm sure the Firestone Web site has similar information. If consumers will contact either your office or these Web sites, they can obtain this information. This is the information I used to go down and look at my Ford Explorer and determine that the four tires on my truck are, in fact, recallable, and I'm apparently waiting, by the way, to find some replacement tires if anybody's listening.

The Chair will now recognize the gentleman from Tennessee, Mr. Gordon.

Mr. GORDON. Ms. Bailey, welcome to your new position and welcome to the committee and welcome to prime time.

Ms. BAILEY. Thank you.

Mr. GORDON. You had mentioned earlier that your agency has established some new programs, like trying to reduce drinking and driving and trying to increase people or awareness of buckling up. How many lives have you estimated that have saved by your efforts, your office's efforts?

Ms. BAILEY. 10,000 last year alone.

Mr. GORDON. Well, that's to be commended. Let me—I want to follow a line of questioning that I mentioned earlier. As I understand it, quality assurance used to be sort of hodge podge of different approaches between the manufacturer and their components or part makers, and basically, it was an end-result type of approach, that over the years there was involved something called the QS 9,000 quality assistance program which changed the focus, so that you would try to control the quality through the manufacturing process all along the way.

And as I understand it, both Ford and Bridgestone/Firestone are saying that this is a good program and that there has been adequate monitoring of this, and reviewing that, they really can't find out what the problem is. Yet over here you have an enormous recall. So we've got, you know, somewhere—we have sort of a black hole in between. Are you familiar with the QS 9,000 quality assurance program?

Ms. BAILEY. It is used extensively in the manufacturing industry. I'm aware of that.

Mr. GORDON. Do you have an opinion as to whether it is adequate or whether there needs to be changes?

Ms. BAILEY. I would need to look into the program. I think there are many manufacturing plants that are certified as QS 9,000, and I don't have a comparison as to whether that's reasonably certified.

Mr. GORDON. Let me ask you this, too. If there are to be changes, do you have an opinion as to whether that should just be an industry——

Ms. BAILEY. Yes.

Mr. GORDON. [continuing] program, that percolates up from the industry or whether there needs to be some type of coordination with your agency, and if so, at what level?

Ms. BAILEY. Yes, I would agree that I think shared responsibility here is what we're talking about today, and so yes, I believe that not only should it remain within the manufacturing industry, but that clearly there could be government involvement as well so that we create the best quality assurance program.

Mr. GORDON. And as we try to look to the future in determining how can we avoid these type of problems in the future, again, do you have advice as to a role that Congress should play in that, if any, and a role that your agency should play, and I say expanded from what occurs now?

Ms. BAILEY. Well, I think what we've identified, and I have spoken to here is that there are two areas that clearly there was information—where there was information not made available to NHTSA. So I think that we may need to work with Congress to look for that kind of statutory remedy, if we're not able within our own regulations to quickly begin to obtain that data from around the world or about claims, and there may be other, more creative ways that we can continue to obtain data that might allow us to identify these problems sooner from garages, from fleet—from the fleet industry and from plaintiffs' attorneys, you know, wherever we can get information.

I think it's important to remember that the consumers need to communicate with NHTSA. The majority of our complaints come from the consumer, and in fact, there was information out there in the public domain. Individuals knew they had a problem, and they were not necessarily contacting NHTSA. So I would like that message out today that we have an 888 number which is DASH-2-DOT. We'd like people to communicate with us and we need perhaps to inform people better about that because that's where we get most of our information. But clearly those other two areas are important. In information exchange between the government and the manufacturers themselves, there clearly was a breakdown in communication here.

Mr. TAUZIN. The gentleman's time has expired. The Chair now recognizes the gentleman from Iowa, Mr. Ganske, for 5 minutes.

Mr. GANSKE. Thanks, Mr. Chairman.

Ms. Bailey, I pointed out in my opening statements that charts by both the Ford Motor Company and Bridgestone/Firestone indicate that there appears to a statistically significant difference in where these defective tires were manufactured and that a high percentage of them were manufactured at one plant, the Decatur plant. Would you agree with that?

Ms. BAILEY. Yes, sir.

Mr. GANSKE. Can you speculate some of the factors that you think might have caused one plant to have manufactured a large percentage of the defective tires?

Ms. BAILEY. I wouldn't want to speculate because we are in the process of an ongoing investigation, and it would be inappropriate for me to do so.

Mr. GANSKE. Well, what are some of the things you would be looking for, defective materials?

Ms. BAILEY. Defective materials.

Mr. GANSKE. Over a 2-year period?

Ms. BAILEY. Other manufacturing questions. It's a complex process that involves molds, it involves personnel, human error. There are a variety of ways in which we would be, particularly through the engineering analysis, now trying to determine what has happened here if indeed there is a defect and to provide that information.

Mr. GANSKE. Are you sending investigators to that plant to interview employees and management?

Ms. BAILEY. Not to my knowledge.

Mr. GANSKE. Why not?

Ms. BAILEY. I think that clearly is a question that we should consider.

Mr. GANSKE. I can't believe that you haven't thought of that. I mean, you know, the way those tires are put together is a factor and possible cause of their blowing apart, isn't it?

Ms. BAILEY. For one thing, the phase we're in now is the engineering analysis where there would be a mechanism to allow us to do that, and we've only been in that phase for a period of days. The initial phase is the preliminary evaluation in which we obtain information and analyze the data. So it may be during the engineering analytic phase that those kinds of activities are set, and I would investigate that and get back to you about that.

Mr. GANSKE. Okay. Well, let me ask you about the engineering phase. Who has the tires that have been recalled?

Ms. BAILEY. Firestone is in—has those tires.

Mr. GANSKE. Do you have a sample, a random sample of those tires?

Ms. BAILEY. We would be obtaining, yes, samples of those tires.

Mr. GANSKE. Have you obtained samples of those tires?

Ms. BAILEY. Yes, we have.

Mr. GANSKE. How many tires have you obtained?

Ms. BAILEY. I could provide that for you. I don't have a number.

Mr. GANSKE. And how do you know that they are a random sample?

Ms. BAILEY. I would provide you with details of the engineering analysis that would give you that kind of specific subject matter.

Mr. GANSKE. Okay. Let's talk about the engineering analysis. Are you doing that in-house? Do you have the expertise at NHTSA to do in-house analysis?

Ms. BAILEY. Yes.

Mr. GANSKE. So that the analysis that will come out will be NHTSA's analysis, not an analysis by Ford and not an analysis by Bridgestone?

Ms. BAILEY. Correct.

Mr. GANSKE. When do you think that you will—when do you expect to have that analysis completed?

Ms. BAILEY. The engineering and analytic phase generally is completed within a year. We have just begun that phase. Generally speaking, an entire investigation takes about 16 months, 4 months for the preliminary evaluation, and then as much as 12 months for the engineering analytic phase. I would obviously like to see that expedited rapidly, but as we did last week, if there's information that tells us that we would want to recommend a widened recall, if there are additional tires out there that are dangerous, we will take action to instigate that recall, and if need be, as we did last week, through a consumer advisory, to inform the American public.

Mr. GANSKE. Do you have access to the records of the tires that are being replaced and their serial numbers?

Ms. BAILEY. Yes.

Mr. GANSKE. So then when you ask for a sample, do you just select certain dates and times of those tires that are being replaced so that you know that you get a random sample?

Ms. BAILEY. That's information that has been requested and is part of the ongoing investigation now.

Mr. TAUZIN. Gentleman's time has expired. The Chair recognizes the gentleman from Ohio, Mr. Sawyer, for a round of questions.

Mr. SAWYER. Thank you very much, Mr. Chairman, and thank you, Ms. Bailey. You are being asked to respond from a very, very narrow base of actual experience to a very broad base of concern that's reflected here on this committee.

Let me ask you a more general question. When an event like a tread separation occurs that precipitates a claim, does that qualify as a defect that must be reported?

Ms. BAILEY. When—you would certainly look at the numbers of tread separations.

Mr. SAWYER. I'm trying to get a sense of——

Ms. BAILEY. Yes, that could constitute a defect.

Mr. SAWYER. [continuing] a claim versus an adjustment, and the reason for which the adjustment is being made.

Ms. BAILEY. Let me say that a manufacturer is obligated to report a known—a believed defect. There is a law that states that within 5 days they would have to report that to NHTSA. Determining when that defect—when you have a defect is a more complex question.

Mr. SAWYER. Yes, and that's the reason I am asking, what constitutes the point at which a claim or an adjustment constitutes a defect per se?

Ms. BAILEY. At times it may be not a large number of claims. It may be a smaller number of claims. For instance—and now, there's a difference between the manufacturer determining that they have a defect and notifying NHTSA and our determining that there's a defect. We are investigating and we will go to the end of an investigation before we determine for certain that there is a defect.

Mr. SAWYER. I agree that that's a complex question, and it's one that goes to the heart of what is a useful, early warning system for NHTSA, to be able to respond to a pattern of events.

Ms. BAILEY. Let me just say about tires in general, because I think it's important that we put it in perspective. Tires do fail. If you run your tires for 40,000 miles, there's a certain expected failure rate. It's been asked why at times there may only be one complaint or several complaints and we initiate an investigation. That is because there are aspects of motor vehicles which should never fail, such as a seat belt. You may know about Chrysler, for instance, in 1996. One failure is too many. A child safety seat, there may be one or two failures and that's enough to instigate an investigation because that part of an automobile should never fail. Tires, on the other hand, do fail. So putting this into perspective, there's a certain expected rate of failure, so that's part of why——

Mr. SAWYER. And tires wear out, they age and they come to the end of their life.

Ms. BAILEY. Exactly.

Mr. SAWYER. In the 1988-89 initial investigation, I'm told by several manufacturers that there was a threshold established at a .5 percent failure rate that was used to trigger an expectation of reporting; is that accurate?

Ms. BAILEY. Most of that information is held confidential, correct, by manufacturers. Tire failure rate, that's a different question.

Mr. SAWYER. Well, in the end, I returned back to the recall that you have initiated this past week, with the Baja 32 by 11:15 that had a single failure, I assume that given the universe that you are dealing in that single failure was a high rate, but that it was due to a puncture. I am trying to get at the question of whether or not we're getting the kind of information that will let us focus in on statistically significant numbers, so that we can get at real catastrophic risks that may be out there in instead of getting lost in a blizzard of data that doesn't lead us particularly anywhere.

Ms. BAILEY. Let me again put it in perspective, that we receive 50,000 complaints a year at NHTSA. 500 of them deal with tires. Fifty of them deal with Firestone tires per year. Only five or so per year; therefore, in the decade preceding when this information came in, only about five a year dealt with the specific tires that are recalled today. So you can see there is a trend that we look for, or a threshold, if you will, but the 46 over a decade when there was a population of 47 million tires did not——

Mr. SAWYER. It did not rise to a level of that kind of concern.

Ms. BAILEY. Correct.

Mr. SAWYER. Let me ask one further question if I can, Mr. Chairman. In an arena in which manufacturers are allied with one another, owned by one another and operate in a variety of different settings, where manufacture takes place in many different continents and where the experience from those continents may be useful to us, what kind of obligations to report do American affiliates or foreign affiliates of American manufacturers have to report those incidents in other environments?

Ms. BAILEY. They do not have an obligation to report at this time.

Mr. SAWYER. Should they?

Ms. BAILEY. That is one of the main things we will be looking at.

Mr. SAWYER. It seems to me that the single most undertaking in the name of safety that the tire industry and others and the automobile industry as well has undertaken is the attempt to harmonize environmental and safety expectations of products on an international basis. Without that capacity, it seems to me that it would be very difficult.

Mr. TAUZIN. Would the gentleman yield to allow me to ask one question before we move on. Does NHTSA have any intentions at all of instituting an action against Firestone for failure to report a known defect?

Ms. BAILEY. That would not be determined until the end of the investigation.

Mr. TAUZIN. I thank the gentlelady. The gentleman's time has expired. The Chair will now recognize the gentleman from California, Mr. Bilbray. The gentleman from Tennessee, Mr. Bryant.

Mr. BRYANT. Thank you, Mr. Chairman.

Ms. Bailey, we've heard a great deal of testimony today, or at least questioning, I think, sort of what I would call leading questions from folks here about your funding levels, and you seem to have responded not maybe the way they want you to say, that you're underfunded and that would solve all the problems in the world.

But I understand that State Farm and your administration have a cooperative relationship and have worked together over the years in situations where there have been problems, and that NHTSA frequently makes requests of State Farm to share nonconfidential claims material to assist you with pending and ongoing investigations. It's extremely rare though that State Farm would, on its own, notify you of a potential trend in claims data that they're so alarmed about that they come to you on their own initiative.

So my concern on this funding issue, maybe some of my colleagues who have raised this question is, if it's misevaluated, which apparently this was the case here, all the funding in the world is not going to solve that. That's an internal issue. You can have triple the budget you have and still would have missed this one because it was not analyzed, at least in a way that would adequately show there was a problem early on.

Let me also ask you a question—that was more of a comment, I suppose—that we on this committee understand that a large percentage of the incidents in question occurred when Firestone ATX, ATX II and Wilderness tires were mounted on Ford—when these types of tires were mounted on Ford Explorers. Understanding that these tires were also mounted on several other types of vehicles, the NHTSA ODI fatal crash summary illustrates that the number of fatalities in Ford Explorers is significantly higher than fatalities occurring in other types of vehicles with these same Firestone tires.

What are your thoughts on this seemingly fatal combination of the Ford Explorer and these Firestone ATX, ATX II, Wilderness tires, and are there any factors that you have identified that explain the usually high fatality rate with this combination, or have you investigated the situation, and if so, what has your investigation shown?

Mr. TAUZIN. I believe the gentleman is referring to document No. 6 in the book, and does the gentlelady have it before her?

Ms. BAILEY. Yes, I have that, and clearly it shows a high incidence of fatalities with the Explorer, much higher than the Bronco or the Blazer, for instance. And I think you're right, clearly it is a combination of situations here that in this case seems to have created a particularly fatal outcome. Specifically, I had mentioned earlier that we'd published a request for comments on June 1 on the use of a stability factor for consumers and consumer information program, and the Senate included it in its version of the DOT appropriations bill language that prohibits us from establishing a rollover rating. I think when you look at these kinds of numbers, you realize that I think the consumer deserves to be aware that there appears to be a higher possibility of a fatal crash with some of these vehicles. I don't think we know which, and I think we need more information, and that's why we need a rollover rating system.

Mr. BRYANT. But is there an ongoing investigation at NHTSA now that has the specific combination?

Ms. BAILEY. We have been prevented from continuing that. We had begun that, but at this time we are unable to proceed until there is a study done. So we are awaiting that, and I would like that restriction removed so that we can do a rollover rating system.

Mr. BRYANT. And who has imposed that restriction? I may have missed this.

Ms. BAILEY. That is part of the Senate's version of the fiscal year 2001 appropriations bill language that is prohibiting us from doing this system until a National Academy of Science study is performed to assess the validity of the measure. I think it's pretty clear it's a valid measure.

Mr. BRYANT. Let me ask you, and it's my last question, and this is kind of a follow-up to a comment that was made on the other side about the latest recall of Firestone tires. I understand that and know for a fact that NHTSA has recommended a recall of several other Firestone tires based upon data received since the opening of this investigation to date, and all the tires, as I understand, the standard is all the tires receiving an overall rate of 12.6 or higher are recommended for recall, and in reviewing the claims data on these particular tires, there are several with an extremely low number of claims involved and reported on these tires, so low that it stands out.

For example, a tire that's rated 87.5 and recommended for recall only received two claims. Both were listed as blowouts. Another tire with a rating of 85.5 received only one claim listed as a tire separation. And a third tire with a rating of 82.2 received two claims, one a road hazard and one a tread separation.

And my question to you, is it really necessary to suggest recall on tires when the numbers are so low? And I'll be the first to stand up and say——

Ms. BAILEY. When production numbers are low, for instance, and the rating therefore is low.

Mr. BRYANT. Right, the number of tires out there on the road are low.

Ms. BAILEY. You may assume that, but at the same time if you look at that information, you will see that there are production numbers of 100,000 and 200,000 where the tread separation rate is equal to, or sometimes significantly higher than the tires that were already recalled. So it's looking at the entire universe of tires, and yes, sometimes it's a low production number, but we still feel if there is a high tread separation rate, that it should be recalled, and we needed to inform the consumers of that and did so.

Mr. BRYANT. And again, I'll be the first to recommend, in fact, I talk to people now about this, and say we have to—if we're going to err, let's err on the side of safety, but again, where there's tire s, where there are only one or two incidents, I'm wondering if there's not an overreaction to some extent, and those are the ones I cited as examples to you.

Ms. BAILEY. Right. I think—again, we put together the population and the tread separation rate, the tread separation claims and came up with a rate. I think you're right, we're erring on the side of safety.

Mr. TAUZIN. Gentleman's time has expired. The Chair recognizes the gentleman from Texas, Mr. Green.

Mr. GREEN. Thank you, Mr. Chairman.

And Ms. Bailey, recognizing you've been on the—in your job for such a short time and some of the questions are difficult, I think most of us, though, want to make sure that the agency itself, not only before you were there but after you're gone, just like a lot of us want to make our institutions survive and corrects problems that we notice. In reading a lot of the briefings, I noticed State Farm, and they will testify later today, said that they had talked to NHTSA twice in 1999 about the rapid increase in claims they're seeing from these particular tires, and by early 2000, it was recorded 45 more injuries and four more deaths, and we're told that seeing a rapid increase in the complaints and injuries involving a single product is a strong indication of problems, and it seemed like there wasn't any response from NHTSA until the Houston TV station reported it.

And I know oftentimes, whether it's on our level on the legislative branch or on the executive side, sometimes we wait until it's called to our attention by the media, and by that time it's much too late, particularly when you have—I understand State Farm has a cooperative office with NHTSA and would share information back and forth.

Can you tell us why there was not any interest, and if one of the largest insurers in the country pointed this out over a number of years, it seemed like?

Ms. BAILEY. It's two issues here.

Mr. GREEN. Yeah.

Ms. BAILEY. And let me just say that, first of all, this is a document that I was referring to which is the memo which looks real official, and it's got all of the details, but apparently this was reconstructed. So you will have to take this with a grain of salt.

When I read this, which says the unsolicited report, it says, this unsolicited report was apparently sent to ODI on July 22, 1998, through the same channel that all other reports requested from State Farm come through. The e-mail is unremarkable stating we have noticed, quote, unquote, 21 failures, inquiries, regarding these particular tires, and there were details on this.

Now, this is apparently, according to my staff, a reproduction of that original exchange which now we have clarified was not even recalled by the individual that we had attributed it to. I think the main issue here is that that was an informal arrangement between—and we don't have it with any other insurance company, but my question now stepping into this job as the new administrator is how could that happen, not that it would have instituted an investigation. This was over several years, and it was 21 complaints out of 40 million tires. It would not have instigated an investigation. So missing this in this case did not prevent us from doing our job.

Mr. GREEN. That's true in 1998, but over a period of years, in fact, early this year it was recorded 45 more injuries and four more deaths occurred.

Ms. BAILEY. We were not made aware of that through State Farm, if that's what you're indicating, but let me just say, the important point here is I want us to formalize——

Mr. TAUZIN. Would the gentleman yield for a second.

Mr. GREEN. I had the impression you were.

Mr. TAUZIN. Again, we're under oath and we will have testimony from a witness later on who says he did inform the agency in 1999 about additional injuries and deaths as a result. I just want to keep the record straight on that because the gentlelady, again, may not be aware of what he is going to testify to a little later on today, and apparently no one at your agency recalls these phone calls.

I thank the gentleman. I will give the gentleman additional time.

Ms. BAILEY. Thank you, Mr. Chairman. I appreciate that. I'm not aware of it and apparently they are not either, but I just would still like to make my point that this is clearly something I'm going to investigate, should we not have more than this voluntary informal arrangement with other insurance companies, so that we can pay real attention to anything that comes in, whether this one would have instigated an investigation or not.

Mr. GREEN. And, again, whether it's informal or formal, obviously if it were formal, we would have documentation of it. But in 1998 if it was told, or 1999, and then earlier this year there was additional—it should have raised somebody's flag at the agency that there may be a problem we need to look at. Frankly, being 3 weeks on the job, it would have made your situation a lot easier today, that maybe in February, if somebody had said wait a minute, we've had these over the last 3 years, let's really look at it and see. I think that the communication within NHTSA, and maybe your leadership now will help that. We need to make sure that there's coordination within the agency and someone knows what's going on.

I know you already answered the question that our ranking member mentioned, but did you know that the information that has been received, whether formally or informally, already represented more deaths on fewer tires than in 1978, Firestone 500 tires?

Ms. BAILEY. But at the same time, we were receiving 2 and 3 and 4 complaints, we were receiving hundreds of complaints on other tires at that same time. So again, it's keeping it in perspective. It does not mean that it is not very serious. It is, and I wish this had been—that the information had been record appropriately.

Mr. GREEN. Another question that comes up, and I know we've talked about it from other members that said, if the standard was already inadequate for tires installed on the cars in 1970's and it would even be more inadequate for the heavier and sport utility vehicles, and let me tell you, coming from Texas, the SUV is our vehicle of choice. I've driven them for 25 years now, and it seemed like—and that's granted I don't go off road except during hunting season, but in 1978, the Society of Automotive Engineers adopted a paper that concluded that 27 percent of the vehicles they studied had tires that were underinflated. That was a major safety issue. Is that still true today?

Ms. BAILEY. Well, apparently going off road works better if you underinflate the tires. I'm certainly not recommending that, particularly the information we have here today, but it is something that I think we may want to work into one of our public information campaigns.

Mr. GREEN. Again, historically, though, in 1978, NHTSA said it's going to require low tire pressure warning systems on vehicles. Do you know whatever happened to that?

Ms. BAILEY. My understanding, it was tabled during the 1980's when there was a cutback on funding.

Mr. GREEN. Okay. Do you think NHTSA will revisit that issue now to make sure that consumers know that if I drive off road I may want to lower pressure, which is also common sense for some of us who may do it, but that we need to make sure that consumers know that when you're on road, you need to inflate them to a certain level?

Ms. BAILEY. Yes, sir.

Mr. GREEN. Thank you, Mr. Chairman.

Mr. TAUZIN. Gentleman's time has expired. The Chair recognizes the gentleman from California, Mr. Rogan—I am sorry, the gentleman from North Carolina, Mr. Burr, is next. I'm sorry.

Mr. BURR. I thank the chairman.

Ms. Bailey, I realize you have only been there for 3 weeks, but——

Ms. BAILEY. It seems longer.

Mr. BURR. It will seem even longer at the end of today, let me assure you. Do you believe that the internal process at NHTSA is one today were State Farm or any insurance company to send an e-mail that looked like the e-mail that was sent before, a pattern, 21 specific examples, two deaths, is that something that NHTSA today would respond to with at least a preliminary investigation?

Ms. BAILEY. I don't know that the 21 would initiate even a preliminary evaluation, but I will say we clearly would respond differently today.

Mr. BURR. What triggered the preliminary investigation in the spring of this year?

Ms. BAILEY. The history is that over a 10-year period in the 1990's we had received 46 complaints. There was one fatality in that, but again, that is that each year during those years, that was about five complaints a year. So it had not triggered an evaluation at that time—investigation.

Mr. BURR. Did it have anything to do with the Texas history and the 25 calls?

Ms. BAILEY. Absolutely, because what that resulted in, we began to investigate and tried to obtain information which was not forthcoming from KHOU, but it did double the number of complaints that we received at NHTSA. So that as that occurred over the next couple of months, it became very apparent we did have a trend, and we opened the investigation on May 2.

Mr. BURR. But the 21 that State Farm pointed out got lost somewhere. If it hadn't, if 25 then triggered it, wouldn't 21 have triggered it if somebody had paid attention to the State Farm?

Ms. BAILEY. We had revisited that, and remembering that tires are treated in a different manner than a seat belt and that was over a decade, it still would not, even combining those two statistics, would not have triggered an evaluation.

Mr. BURR. So there's been no change in the internal process at NHTSA, since this investigation began, before and after?

Ms. BAILEY. We had a change 2 weeks ago in that we are now reviewing partly to prepare for today, but partly because I'm reviewing what it is that has occurred in this investigation and how it is that NHTSA completes its mission.

Mr. BURR. NHTSA has a monthly service bulletin, am I correct, in the terminology that I use, some type of bulletin?

Ms. BAILEY. We are not sure what you mean, but there is a press release that goes out on a regular basis, if that's what you're referring to.

Mr. BURR. What was the date of the first one that specifically addressed the concern with these tires?

Ms. BAILEY. I don't think that——

Mr. BURR. They're two different things?

Ms. BAILEY. They're two different things.

Mr. BURR. I wouldn't think that a press release—it's my understanding there is some type of monthly publication that NHTSA puts out. Am I incorrect?

Ms. BAILEY. But it would not include this information. It's on recalls, the monthly bulletin you're talking about identifies the recalls.

Mr. BURR. Okay, let me move on. You mentioned earlier if we only had a million dollars more we could do this. Where specifically were you talking about that million dollars?

Ms. BAILEY. That's for the Office of Defects Investigation. It would mean we could hire more investigators. It means we could do more testing.

Mr. BURR. What's your budget this year?

Ms. BAILEY. It means we could do—the budget is approximately total for NHTSA, $400 million. It is $395-plus.

Mr. BURR. It's 362 according to the Transportation Committee. Of that, how much of it's the administrator's office and staff?

Ms. BAILEY. How much is what?

Mr. BURR. The administrator's office and staff.

Ms. BAILEY. Administrative staff?

Mr. BURR. Administrator's office.

Ms. BAILEY. To break it down for you, what's really important to know is that if you round it off to about $400 million just for the sake of ease, about half of it goes to grants first of all.

Mr. BURR. But specifically, the administrator's office is about 10 percent of it, right?

Ms. BAILEY. No, it's not 10 percent. We'll give you the number in a minute.

Mr. BURR. That's $35 or $36 million of $366—they're shaking their head. I'll go by the numbers that I have got. Why short term? Why don't we reprogram within that——

Ms. BAILEY. Reprogram?

Mr. BURR. Why can't we move money from an area——

Ms. BAILEY. We're doing some of that right now——

Mr. BURR. [continuing] that is administrative to an area that gives us the staffing capabilities or the resource capabilities to address hopefully a short-term problem?

Ms. BAILEY. We have done that. In fact, we have reassigned staff and reallocated funds because of this investigation.

Mr. BURR. The one thing that has gone without mention I believe today is that Congress 6 years ago started a new program that is outside of NHTSA's budget. It is the Hotline. The Hotline has increased from an appropriation of about $500,000 to $1.2 million or $1.3 million.

Ms. BAILEY. But I understand it has been cut back some this year; and we would like to see that fully funded, too, because that is where most of our information comes in.

Mr. BURR. I wait patiently in hopes that we will get appropriations bills signed this year, but today I am not too optimistic.

Mr. TAUZIN. The gentleman's time has expired.

Mr. BURR. The chairman has been very generous. I thank Ms. Bailey for her testimony, and I yield back.

Mr. TAUZIN. The Chair recognizes the gentleman from Maryland, Mr. Wynn, for a round of questions.

Mr. WYNN. Thank you, Mr. Chairman.

Dr. Bailey, welcome. I don't envy you with only 3 weeks under your belt, so when I use the term "you", I am not referring to you, I am referring to the agency.

Several questions. First of all, it says that NHTSA had received 46 complaints over 9 years by the end of 1999. Is that sufficient to initiate a preliminary investigation?

Ms. BAILEY. No, because that is out of a population of 47 million tires over several years, and at the same time we were receiving approximately 5 per year about Firestone. We had hundreds from other tire companies.

Mr. WYNN. Is there a specific threshold number that is utilized to initiate a preliminary investigation?

Ms. BAILEY. There is not a specific number, but it is certainly not 5 a year.

Mr. WYNN. But 5 a year represents an average. But if most of them had occurred in the last couple of years, would that not have kind of triggered a concern?

Ms. BAILEY. Part of what I am looking at as a new administrator is what those thresholds would be, and we are doing that right now.

Mr. WYNN. So there is a review——

Ms. BAILEY. As I say, the difference between a child safety restraint device and tires, so it is difficult to come up with a formula. But I do believe we should develop a threshold model.

Mr. WYNN. So you are going to do that internally through regulation and won't need legislation, is that safe to assume?

Ms. BAILEY. Right, and it clearly wasn't 46 over 9 years, but yes, yes, sir, we will.

Mr. WYNN. Okay. And when you look at that, do you give any additional weight to the number of fatalities as opposed to just complaints?

Ms. BAILEY. Clearly, catastrophic crashes and fatalities would weigh into that formula.

Mr. WYNN. Did that 46 include the 21 that were reported by Firestone?

Ms. BAILEY. That 46 did not. We are still evaluating where there may have been some overlap, but it doesn't appear that it did overlap.

Mr. WYNN. Okay. One of the things that concerned me was a report contained in the committee—well, a statement contained, rather, in the committee report suggesting that when they inquired about the 21 the agency was not able to produce any evidence or recollection of it, but yet they actually found the case summaries of 21 cases in the files of your agency. Is that—first of all, is that true?

Ms. BAILEY. Yes. Apparently, the document that I referred to is the document that was reconstructed, and it does have specific information that was available through NHTSA.

Mr. WYNN. Okay. So is it fair to assume that someone within the agency misspoke about the existence of the 21?

Ms. BAILEY. The existence of the claims—what we are differentiating here is that Mr. Beretsky apparently did not remember. That is different than it not existing. So we did have information. He didn't recall the information.

Mr. WYNN. Okay, fine.

Mr. TAUZIN. Would the gentleman yield for a second?

Mr. WYNN. Yes, Mr. Chairman.

Mr. TAUZIN. I thank the gentleman. I will give him additional time.

The point I think the gentleman is making, though, is that you received information over these years of incidents of failure. You have counted them up. 49?

Ms. BAILEY. Well, this is different. This is the 21——

Mr. TAUZIN. That is my point, and I think that is his point. During that same period, you received an e-mail saying here is 21. Here is a description of what happened. And somehow that got filed away and never even got counted. I think the gentleman is asking, what happened here? Why was it ignored in the analysis the agency was making as it counted all of these incidents as coming into the agency? I thank the gentleman.

Would the gentlewoman respond?

Ms. BAILEY. There is a difference between a claim and a complaint. There should not be, though. I agree with you, that clearly, even though these were claims obtained through an informal relationship between the one company, the one insurance company of them all that does relate to us in that fashion, even though that was an informal arrangement, there should be a mechanism, and I certainly will put one into place and hope to widen our ability to obtain that information to other insurance companies so that it does not remain informal or separate from our normal process of acquiring a data base.

Mr. TAUZIN. I thank the gentleman and the gentlewoman. The Chair will extend the time for the gentleman another minute.

Mr. WYNN. Thank you, Mr. Chairman.

Dr. Bailey, do you have any mechanism for getting information on recalls that occur in other countries?

Ms. BAILEY. At this time we do not, and they are not—a manufacturer is not obligated to provide that, but we will.

Mr. WYNN. All right. And you were clear—I think in response to several of my colleagues you said that you definitely want the authority to compel that information?

Ms. BAILEY. Yes, sir.

Mr. WYNN. Okay. Mr. Ono in his testimony, his written statement, says that he met with you on August 8 and reviewed what he knew, and then he voluntarily initiated the recall. Was that meeting at your invitation, or was that—did they indicate they wanted to come in? What were the circumstances of that meeting?

Ms. BAILEY. We arranged that meeting and recommended the recall on August 8.

Mr. WYNN. You actively recommended the recall?

Ms. BAILEY. Yes.

Mr. WYNN. But to your knowledge, had his company taken—I am sorry, go ahead.

Ms. BAILEY. Just saying the dates are off. The actual meeting was the 4th where we recommended the recall, but that sounds wrong to me, too.

All right. On the 4th was the meeting where we recommended the recall. On the 8th, they agreed to do so; and on the 9th, they did the recall.

Mr. WYNN. I just want to clarify who took the responsibility here. Because there is a suggestion or implication that perhaps they came in and wanted to be good corporate citizens, and I want to clarify that it was at your request that they came in, and that is what resulted in the recall, and absent your request that it perhaps may not have happened?

Ms. BAILEY. No, that is exactly how it happened, that we initiated the meeting recommending the recall, and that they agreed to the recall and did so on the 9th.

Mr. WYNN. Okay.

Mr. TAUZIN. The gentleman's time has expired.

Mr. WYNN. Thank you, Mr. Chairman. You have been very generous.

Mr. TAUZIN. Thank you, Mr. Wynn.

The Chair now recognizes the gentleman from California, Mr. Rogan.

Mr. ROGAN. Mr. Chairman, thank you.

Dr. Bailey, although you may not have always felt it over the last couple of hours, your presence is welcome here today.

Ms. BAILEY. Thank you very much.

Mr. ROGAN. I echo the appreciation for you coming.

Something my friend from Maryland just asked triggered a question. Is there really a difference in the way NHTSA would handle a potential safety problem if the information came to them by way of an informal information channel versus a formal complaint?

Ms. BAILEY. Unfortunately, in the past, that was the case. I don't think it was intended to be. I think there is a human error factor here, if you will, or a systems problem, and we are going to clearly correct that. That should not be the case. Any information that would let us know the possible defect or need for an investigation should be part of the data base. At this point, there is no real mechanism for claims, because that is not something we are routinely obtaining.

Mr. ROGAN. So despite the seriousness and the potential safety hazard of information that would come to NHTSA under your predecessors, that would never have made it into the data base if it had not come in by way of a formal complaint?

Ms. BAILEY. No, it should have and would have by all rights. Apparently, this did not happen in this case.

Mr. ROGAN. When the State Farm information was received in 1998, was it actually received by Mr. Beretsky?

Ms. BAILEY. Apparently, it was another individual who took the actual information; and the safety defect specialist was Mr. Beretsky who reviewed. But there was another individual who actually took the information.

Mr. ROGAN. But Mr. Beretsky would have been the receiving official back in 1998; he isn't just a person that reconstructed this in a recent memo?

Ms. BAILEY. Correct.

Mr. ROGAN. Under the protocols of 1998, when information was received from a single source of 21 problem tire incidents, including two fatalities, was it the protocol of NHTSA then to enter that into the data base?

Ms. BAILEY. That should have been entered into the data base, yes.

Mr. ROGAN. And for some reason, that never happened?

Ms. BAILEY. Apparently, it did not happen.

Mr. TAUZIN. The Chair will extend the time of the gentleman for at least 30 seconds.

Mr. ROGAN. Do you have any information in your files from 1998 to indicate that complaints about these tires had come into NHTSA from some source other than the State Farm representative?

Ms. BAILEY. Yes. There would have been information as part of the complaints that I mentioned that occurred during the 1990's where we were gathering information and it was in the data base.

Mr. ROGAN. As of 1998, how many complaints, or information of specific incidents, did NHTSA have in relation to these tires?

Ms. BAILEY. I could give you the exact number, but it must have been—being we got 246 by the year 2000, it must have been in the high 30's, I would imagine.

Mr. ROGAN. Typically, would that be sufficient to trigger a preliminary investigation?

Ms. BAILEY. Not with the population of 47 million tires, when there were hundreds of complaints about other tires being received at the same time that we were receiving per year 3 or 7 about these particular tires, so it would have not prompted an investigation of these tires.

Mr. ROGAN. As to the complaints that you had received by the end of 1998, were they generic complaints of all kinds of different problems, or did they all appear to be essentially the same problem with the same type of vehicle?

Ms. BAILEY. There were different types of problems mixed in. They were not all tread separation problems.

Mr. ROGAN. Were the bulk of the complaints received about tread separation?

Ms. BAILEY. I believe the majority of them were tread separation, is that correct?

They don't want to say that, so we will provide that for the record.

Mr. ROGAN. Okay.

Ms. BAILEY. I know a lot of them were.

[The following was received for the record:]

A global search of NHTSA's Office of Defects Investigation's (ODI) general database (DIMSII) for all complaints on Firestone tires from January 1, 1990, to December 31, 1998, reveals a total of 356 records, which in turn, when duplicate records are eliminated, represent 336 distinct consumer complaints. Of these, 14 mention the words "...tread separat..." in the text of the complaint. This would include "tread separated", "tread separating", "tread separation", etc.

A more focused search in DIMSII for complaints about Firestone ATX, ATX II, and Wilderness A/T tires for the same time period reveals 14 records, one of which mentions "tread separation." This is the number of complaints that would have been seen by a screener looking at the DIMSII consumer complaint data for these tires at the end of 1998.

During the spring of 2000, as part of her preparation for the formal opening of the Firestone investigation, the ODI investigator searched DIMSII using a broader definition for all reports relating to Firestone tires and tires regardless of make on Ford Explorers. She then reviewed each complaint summary to identify those that seemed to be within the scope of the anticipated investigation. This effort yielded 32 reports received by NHTSA by the end of 1998,11 of which mentioned "tread separation" on the original document. After the formal opening of the investigation, an additional four reports were identified to have involved tread separation, so of these 32 reports, 15 are now known to have involved tread separation.

Mr. ROGAN. Mr. Chairman, thank you. I yield back.

Mr. TAUZIN. I thank the gentleman.

The Chair recognizes the gentleman from Minnesota, Mr. Luther.

Mr. LUTHER. Thank you, Mr. Chairman.

First of all, before I ask any questions, as I understand it, you have issued an advisory recommending the recall of an additional 1.4 million. So my question is, what kind of a danger is posed, in your view, by those additional tires?

Ms. BAILEY. Let me, first of all, say that I think that was excellent work on the part of the NHTSA staff. It shows that, even during an investigation, they are acquiring data at a rapid rate; they are analyzing the data; and when they see a serious safety problem like was apparent in the high tread separation rates of those additional almost 1.5 million tires, they were alert enough to make me aware of that. We were able then to recommend a recall, but, more importantly, let the American public know about the danger.

Mr. LUTHER. Thank you. And where does that stand as of this time? You recommended it, and where does the recall of those additional tires stand?

Ms. BAILEY. We are not able to direct a mandatory recall until we finish the complete investigation, which was why it was important that we do the consumer advisory, because that could be theoretically as long as a year, though I want to see this completed within 6 months.

Mr. LUTHER. Have you received any response as of this time to your recommendation?

Ms. BAILEY. From the manufacturer?

Mr. LUTHER. Right.

Ms. BAILEY. Firestone did not choose to recall those tires at that time, and I am sure you can—they could make a statement to that effect as to the reasoning.

Mr. LUTHER. Now I would like to go back to the discussion——

Ms. BAILEY. Let me just add, it was a short timeframe. We determined on the 30th that we had a serious problem, and on the 31st they determined they didn't want to make a recall. As you know, that was going into the Labor Day weekend; and we did not feel we could withhold that information from the American public about 1.4 million tires.

Mr. LUTHER. Sure.

Back to the information you received 2 years ago from State Farm. The question that comes to my mind is whether or not the individuals within the agency had the necessary statutory and regulatory authority and tools, if you will, to act upon that information. You have already indicated, I believe, if I understand it, that recalls outside the country are not something you could—you are entitled to get information on. Does that also extend to any activities outside the country—and I believe you have also indicated that you were not entitled to get information on claims. I assume that applies to both outside the country and within the United States.

I would like you to verify, if you could, my understanding on those two points, and are there other constraints because your agency would not have the appropriate statutory and regulatory authority so that they would be limited when put on notice of a possible problem?

Ms. BAILEY. First, we would have to have the authority to obtain the information, and then we could use that information in order to deal with the particular manufacturer in the same way we are in this investigation.

Mr. LUTHER. And that is why I asked the question. What I would like to know is, in what areas do you not have necessary statutory or regulatory authority in order to get the job done for the American consumer? You have indicated a couple already. Claims information, you would like to have that authority, as I understand it.

Second, you would like to have authority to get any kind of information necessary, I assume, from outside the United States, not just recall information but claims information and presumably other information. What else, in addition to that?

Ms. BAILEY. Well, those are the two main issues here. If the claims information that we now know of were made available, it would have changed the course of events here. If we had known about the foreign recall or replacements, that also could have changed the course of events. So those are two areas that are high on my priority list to look at in terms of our authority and being certain that, in the future, we are able to obtain that data.

Mr. LUTHER. So basically what you are saying is that in 1998 your employee did not have the authority to go to a manufacturer and say, please tell us if you have had complaints or problems; is that correct?

Ms. BAILEY. We could go to a manufacturer and request that information. We couldn't—there was no obligation of the manufacturer to provide information from outside the United States.

Mr. TAUZIN. Would the gentleman yield for a second?

Mr. LUTHER. I will yield, Mr. Chairman.

Mr. TAUZIN. The staff has asked me to clarify this, Mr. Luther, and I will yield additional time, if you don't mind.

Our understanding is that you do have the authority to request of a company like Firestone or Ford information referenced to recalls or replacements in other countries. You could request that at any time. And the question is, if you did hear about an action in Venezuela or Saudi Arabia, if that came to your attention, doesn't your agency today have the authority to say, tell us about what is going on in Saudi Arabia or Venezuela? And if you do, what would be the obligation of the company to whom you sent such a request?

Ms. BAILEY. They are not obligated to provide us with information about defects or recalls in other countries.

Mr. TAUZIN. They could refuse to answer the questions you asked them?

Ms. BAILEY. I guess what you are asking is, if we make the request of information, would they give that to us, versus them being obligated to provide it.

Mr. TAUZIN. Without a request.

Ms. BAILEY. Yes. If we were aware of it and made the request, they would provide that.

Mr. TAUZIN. So that what you are saying is that, absent a request from NHTSA, they don't have a legal obligation to voluntarily provide you the information.

Ms. BAILEY. Exactly.

Mr. TAUZIN. But you always had and have today the capacity to request that information, in which case you would receive it, would you not?

Ms. BAILEY. Yes.

Mr. TAUZIN. Mr. Luther, I yield back.

Mr. LUTHER. Thank you, Mr. Chairman.

So you are saying that, if you make a request, there is an obligation then to respond to that request, even if it includes information from outside the country?

Ms. BAILEY. Yes.

Mr. LUTHER. And would that be true of claims also, whether outside or inside? In other words, could you make a request?

Ms. BAILEY. Made a request——

Mr. LUTHER. If you made a request for claim information, what claims have been filed outside and inside the United States, would they be under an obligation to provide that?

Ms. BAILEY. If we made the request, yes.

Mr. LUTHER. Finally then, let me, before I wrap up, on that current advisory recommending 1.4 million more tires, how serious a danger is that currently to the American public, in your view?

Ms. BAILEY. I felt it was serious enough to do the first consumer advisory during an investigation that has ever been done by NHTSA. The point being is that I looked at the data. There were tread separation rates in the tires that were proposed. Again, sometimes it was a small population, but sometimes it was 100,000 produced or 200,000 produced, and those tread separations were significantly higher, sometimes several times higher than the tread separation rate of the tires that were already recalled.

Mr. LUTHER. So if I understand what you are saying, then that recommendation for another 1.5 million tires in your view is presenting a very serious safety hazard to the American public as of this time?

Ms. BAILEY. Serious enough where I would still recommend a recall of those tires.

Mr. LUTHER. Okay. Thank you.

Mr. TAUZIN. I thank the gentleman.

The Chair recognizes the gentleman from Illinois, Mr. Shimkus.

Mr. SHIMKUS. Thank you, Mr. Chairman. We have gone over this before, but, for myself, defects get reported, claims do not?

Ms. BAILEY. The obligation to report? Yes. If you know of a defect, if a manufacturer knows of a defect, they are obligated to report that to NHTSA.

Mr. SHIMKUS. But if there is a claim, that doesn't mean that a defect reporting has been done?

Ms. BAILEY. Correct.

Mr. SHIMKUS. And if there is an industry-to-industry—say that there is a blowout and the insurance company pays out to the claimant. The insurance company then goes to Firestone and says, okay, this is a faulty tire; pay me what I had to pay in the claim. That is not reported?

Ms. BAILEY. That is not reported either.

Mr. SHIMKUS. And I think those are things that we need to probably have added to your tools——

Ms. BAILEY. Exactly.

Mr. SHIMKUS. [continuing] so that we can connect the dots better than having a TV station do it for us, would you agree?

Ms. BAILEY. Right.

Mr. SHIMKUS. What would also help connect the dots is if we knew and if industry knew that they were making recalls overseas that that was reported back to you?

Ms. BAILEY. Right.

Mr. SHIMKUS. Mr. Chairman, that is all the questions I have. I yield back.

Mr. TAUZIN. The Chair recognizes the gentlewoman from Missouri, Ms. McCarthy.

Ms. MCCARTHY. Thank you very much, Mr. Chairman.

Dr. Bailey, thank you very much for your testimony here today.

I wanted to spend a moment with you on an item that was in the Wall Street Journal today from a column by Timothy April on Firestone, who has been here before, where it talks about in the wake of the 1978 recall there were a flurry of proposals—probably by members of this committee more senior than I; this is only my third term here—for regulatory changes aimed at tightening——

Ms. BAILEY. It is only my third week. I just thought I would share that with you.

Ms. MCCARTHY. So I am speaking with someone even more junior.

All these notes were dropped or sharply watered down after the Reagan administration came into office and proclaimed one of its goals to be lightning the regulatory burden on businesses. And the article goes on to talk about a number of proposals, one to require the auto and tire industry to come up with a system for warning drivers when pressure in their tires have dropped, other proposals about under-inflation and so forth, requiring tire makers to print identification numbers on the exterior. I think some of these have been mentioned by other members in questioning earlier today.

But the article goes on to point out that most tire makers, including Bridgestone and Firestone, say they favor updating regulation; and in a panel much later today Clarence Ditlow from the Center for Auto Safety is going to talk about some of the standards that do need to be upgraded and that have not been acted on by your administration. So I wonder if I could just ask you a question or two about some of these suggested changes; and if you have thoughts on other standards that you intend to address and haven't shared with the committee, I would be glad to have you share those at this time.

Do we now need standards on rollover protection, including stronger standards on roof strength for rollover protection?

Ms. BAILEY. Yes.

Ms. MCCARTHY. Okay. And what about tire recalls and replacement policy? In 1978, tires didn't last as long as they do now. Radial tires now last 55,000 miles or more. I was flying here today on the plane sitting next to a gentleman reading these articles, and we got to talking about it. And he had tires on a different vehicle than Ford go out and he had had the car for less than a year—or just over a year. So the warranty had expired, but the same problem existed on his tires, and he managed to get them replaced. But the manufacturer has no obligation to replace a tire for free if it is more than 3 years old on some vehicles, 1 year on others.

Shouldn't replacement policy be looked at and maybe have Congress remedy it by providing for reimbursement in the statutes or something to make sure that consumers are protected?

Ms. BAILEY. You mean in a recall situation or a warranty situation?

Ms. MCCARTHY. Warranty situations where, in fact, a tire goes bad because of a problem like this or another serious problem not anticipated following the warranty expiration.

Ms. BAILEY. If it is a problem like this and it is a recall situation, we do have an amendment that is at this time to extend the recall period by several years.

Ms. McCARTHY. What about if it is just a guy sitting next to you on a plane today whose tires went out. He wasn't hurt, and it just happened, and he had to fight with lawyers and others to get them replaced? Should the Congress take a look at recommending this, or can you do that?

Ms. BAILEY. That sounds like a warranty issue for the manufacturer.

Ms. McCARTHY. Exactly. That is what people at the Center for Auto Safety are saying. Some of these things need to be rethought. Tires last longer now, or the warranties have changed, and maybe we need to take a look at that.

Ms. BAILEY. Well, again, I think that is part of our amendment that extends the recall time. But I think, of what you have mentioned, I think the serious issues are the possibility of developing a system so that most of us who would not be aware when our tire pressure is incorrect would be alerted to that, a mechanism for that. And our rollover rating system also I think is a real safety issue. So those I clearly would support.

Mr. STUPAK. Would the gentlewoman yield?

Ms. McCARTHY. Of course.

Mr. STUPAK. I want to follow up on one of the first questions you asked.

Dr. Bailey, in this whole situation today, you have indicated you only had a few reports about these tires, but we talked a lot about 1978 and the Firestone 500. So when I am driving down the road and if I have a blowout, with all due respect I don't think of NHTSA. I go back to where I bought my tire and where I bought my car, and that is what the American people do. We don't really think of calling you to report this.

In 1978, though, you said that Firestone 500—you had lots of complaints, and that is how you learned about it. That is what started this situation for the recall of the Firestone 500. We don't have that situation here today in 2000. What happened in that 20-year period? Why was the agency able to act quickly or more quickly based upon numerous complaints in 1978 but not as quickly as we would like to see here in 2000? What was the difference? Were there policy changes? I think Ms. McCarthy hit on part of it in her first question. What happened?

Mr. TAUZIN. The gentlewoman's time has expired, but the gentlewoman may respond.

Ms. BAILEY. I would need to have the numbers to look at how quickly they responded and to what number, but I think it brings up the question of a threshold, and I think we do need to develop a formula so that we have a clear threshold that takes into account a variety of factors, including the stats and numbers of——

Mr. TAUZIN. The gentlewoman's time has expired.

The chairman must move to recognize another member, unless we get a unanimous consent request.

Ms. McCARTHY. Mr. Chairman, I would request unanimous consent for an additional minute.

Mr. TAUZIN. Without objection, so ordered.

Ms. McCARTHY. I yield to the gentleman from Michigan.

Mr. STUPAK. I think you will find, in 1978, NHTSA back then had a good working relationship with garages, with tire garages, repaired tires and things like that. In 1978, the information that was gleaned that came through your agency was because we had people back then, and as Ms. McCarthy said in her first statement or her first question, there have been a number of budget cuts.

I know there has been a lot of talk about getting more money and more money here where those budget cuts really hurt and American consumers no longer have protection, is we don't have the eye and ears in the field like we did back there 1978. Now we have to rely on the American people to alert us when something is going on.

With all due respect, I just don't think of NHTSA when my tire goes out. You had people checking with the garages, and they would see a pattern. Because a manufacturer does not have to report a tire or an automobile manufacturer does not have to report unless they consider it a defect. And if you do not consider it a defect, there is no duty to report to you. Therefore, there is no knowledge on your part of a defect that is occurring.

With that, I yield back.

Mr. TAUZIN. Before he yields back, I think it is important to point out that our investigators queried your personnel on that very issue and we got a different answer. We were told that this formal program was eliminated in the 1980's, but NHTSA continues the informal contacts. The liaison office for NHTSA informed our investigators that the formal program back in the 1980's was thought to be fairly useless. Is that accurate?

Ms. BAILEY. Which formal program?

Mr. TAUZIN. The formal program of having people in the garage shops reporting to NHTSA?

Ms. BAILEY. We do still communicate with garages, yes.

Mr. TAUZIN. You still do that today.

Ms. BAILEY. With garages, yes.

Mr. STUPAK. But it is not a required formality like it was in the 1970's where you actually had people going out there and doing it, not relying on people to contact you. You actually took the initiative, and you didn't need to wait and react, like we are here today.

Ms. BAILEY. Okay.

Mr. TAUZIN. I think the information was just sent in in those days; and you still maintain those informal contacts, do you not?

Ms. BAILEY. There are still contacts made with garages.

Mr. TAUZIN. I thank the gentlewoman.

The gentlewoman's time has expired.

The gentlewoman from New Mexico is recognized.

Mrs. WILSON. Thank you, Mr. Chairman.

I appreciate you being here, and I appreciate your endurance as well.

In your testimony, I would like to get back to the State Farm claim report in 1998 which you testified did not provide an indication that would justify opening a defect investigation. Yet, I have from the staff investigation of the NHTSA documents, in 1994, NHTSA opened a preliminary evaluation on Michelin tires——

Mr. TAUZIN. Document number 2, page 13, if people wish to refer to it.

Ms. BAILEY. In this book?

Mr. TAUZIN. Document number 2, page 13.

Mrs. WILSON. It is a NHTSA decision document on opening a preliminary evaluation on tread separation on a Michelin tire based on five complaints which resulted in no injuries and no fatalities. Was there a change in the guidance for your employees between 1994 and 1998 as to what justified opening a preliminary investigation?

Ms. BAILEY. There at this time is not a formula that dictates what the threshold is that would warrant initiating an investigation. Clearly, there needs to be, and that is one of the things I think we will be identifying, whether or not—what is the criteria for an investigation.

Mrs. WILSON. So is it now really just one guy's call? Is it just one person's call within your agency as to whether they start this paperwork?

Ms. BAILEY. No, it is not one individual, but it is clearly within the NHTSA staff, and it may not be an individual, but at the same time, I don't think it is a clear enough process. I don't think we have defined the mechanism well enough.

Mrs. WILSON. Looking back on it now, do you think that decision to say this doesn't meet the threshold for opening a preliminary evaluation, do you think that was the right call?

Ms. BAILEY. You mean from the 21?

Mrs. WILSON. From the State Farm report in 1998 of 21 claims and two fatalities?

Ms. BAILEY. Before I would determine what that threshold is, I would want to analyze an appropriate formula for determination. I am not sure that 21 over 8 years still necessarily reaches that threshold, but I don't understand three being the threshold either. So I think we need to determine what is an appropriate threshold when millions of tires are being produced.

Mr. TAUZIN. Would the gentlewoman yield for a second?

Mrs. WILSON. I yield to the chairman.

Mr. TAUZIN. I wish to correct the record. The 21 incidents reported we are told is over a 6-year period, not an 8-year and not a decade but over a 6-year period.

I thank the gentlewoman.

Mrs. WILSON. Is it unusual for a company that is approached by NHTSA to refuse to recall these other tires, these 1.4 million tires you issued the warning on? When NHTSA goes to a company and says we think you have a bigger problem here, is it unusual for a company to refuse?

Ms. BAILEY. As you know, my tenure is short at this point, but my review of this and what has been provided to me about the institutional memory, if you will, or the historical pattern is that, generally speaking, when we recommend a recall and have statistics to support that, that, generally speaking, that is voluntarily accomplished with the manufacturer.

Mrs. WILSON. Now, this happened just before this last holiday weekend. Were you surprised by Firestone refusing to expand the recall?

Ms. BAILEY. Yes, I was surprised.

Mrs. WILSON. How did you react?

Ms. BAILEY. By saying then, we need to determine how we best inform the American public about this problem, and we determined that that was an advisory, and——

Mrs. WILSON. Were you told by Ford Motor Company about the Saudi Arabia problem or about Venezuela?

Ms. BAILEY. We were not told until after we had already opened the investigation—on May 2.

Mrs. WILSON. So there was no voluntary information provided by Ford America that they had a problem overseas?

Ms. BAILEY. No.

Mrs. WILSON. For your employees, when they are deciding whether to open a preliminary evaluation, are there guidelines? Is there a criteria that they used that is formalized in any way within your department?

Ms. BAILEY. For a preliminary evaluation, there is an initial assessment done previously in which we obtain data, review data, analyze data, before doing the first phase of an investigation, which is the preliminary evaluation. So there is an assessment of the data that has been presented or obtained prior to opening the investigation that is done methodically.

Mrs. WILSON. What I am asking is, is there a policy and procedures manual? Is there training that is done that tells your employees, here are the criteria, here are the things that you should take into account when you get consumer complaints or e-mails in from insurance companies on how you are supposed to evaluate this? What criteria you should use in deciding whether to start a preliminary investigation, or to take that e-mail and put it in your circular file?

Ms. BAILEY. Well, apparently, with an e-mail, in that informal arrangement, that was either not spelled out or not clearly enough spelled out as to what to do with that form of a warning.

Mr. TAUZIN. The gentlewoman's time has expired.

The Chair recognizes the gentleman from New York, Mr. Fossella.

Mr. FOSSELLA. Thank you, Mr. Chairman.

In an effort just to solidify the truth, I just want to make sure, Dr. Bailey—there was an article in the Washington Post dated August 25 with Secretary Slater who said that regulators launched an investigation into the problem of tires as soon as they received complaints linking the tires to fatalities. Have I heard you correctly today? You said that did not occur, right?

Ms. BAILEY. Clarify for me what your question is.

Mr. FOSSELLA. Well, regarding the State Farm e-mail in 1998, presumably, the agency was notified 2 years ago, and you are claiming that nothing happened, right?

Ms. BAILEY. It is important that—yes, there was one crash with two fatalities in that group; and so, apparently, the Secretary was not aware of that. But, at the same time, he did not necessarily misspeak, because he was talking about the complaints, and that is different than the claims. I don't mean to—that should be——

Mr. FOSSELLA. I just want to set the record straight. Just so the Congress knows and the American people know, nothing happened when the agency was first notified, right? Regulators did not launch an investigation 2 years ago, correct?

Ms. BAILEY. Correct.

Mr. FOSSELLA. So you are correct, and this is incorrect?

Ms. BAILEY. I believe——

Mr. FOSSELLA. You can't both be right.

Ms. BAILEY. Absolutely, and that is incorrect, but I think the information he had at the time is what created the confusion.

Mr. FOSSELLA. Okay. And if I heard you correctly before with respect to the protocols, the claim in 1998, the e-mail should have been logged, so this debate about funding is moot, because I think you used the words it was a "human error?"

Ms. BAILEY. If you are asking did I think the funding created that problem, it did not create the problem.

Mr. FOSSELLA. It did not. So the conversations centered on funding had nothing to do with the fact that this e-mail was not logged in 1998, right?

Ms. BAILEY. Right.

Mr. FOSSELLA. And is it safe to assume then that if that had been logged adequately that it perhaps would have launched an investigation or it would have caused NHTSA to open an investigation about a year earlier?

Ms. BAILEY. My trend analysts tell me that, even combined, given the population of tires and the years, 6 years for the State Farm data and the 1991 to 2000 data of the 46 complaints, that that would not still have triggered an investigation. But I think what we recognize here is that we need to review whether or not we have an appropriate threshold formula.

Mr. FOSSELLA. Okay. Regarding some of these, aside from this review that is ongoing, you mentioned before about the standards and the tests, and there is some debate as to Ford recommending whether the high speed tests between 75 and 85 miles per hour, 32 pounds per square inch, Ford recommends 26. When did you begin—when did the agency begin to reevaluate the standards inasmuch as it hasn't happened I guess in 22 years?

Ms. BAILEY. Apparently not soon enough. I mean that seriously.

Mr. FOSSELLA. Is that what NHTSA has said, that we need to change this?

Ms. BAILEY. I think there has been ongoing work, but I think it was not the highest priority in that, prior to the previous recall, there had not been—you know, of the two major recalls, I think that it was not a high enough priority.

Mr. FOSSELLA. But you mentioned before I think that this is going to be changed. There isn't a date in the near distant past that someone said we have to change this?

Ms. BAILEY. We are definitely updating at this time; and we have a proposal coming in in the spring, which is still not soon enough, given what——

Mr. FOSSELLA. I am just curious as to, if you think that is that vital, why wouldn't you do it tomorrow?

Ms. BAILEY. What I am saying to you here is that this is where we are today. And in the last 3 weeks I have reviewed these issues and that is one that I believe we need to expedite. We are, by the way, looking to manufacturers for comments on that as well.

Mr. FOSSELLA. Okay. Fair enough. The notion that this foreign recall and you can't trigger an internal investigation until you are notified, is there any proactive end of NHTSA to say, you know what, folks, there is a recall in Saudi Arabia; there is a recall in Venezuela; perhaps we should dive into this on our own.

Ms. BAILEY. Well, that is the point we were just making. Had we had some sense that we should be regularly obtaining that information, requesting that information, that may have come to light.

I still don't think that is the best method. I think, instead, we should have authority to require that any recalls or replacements or serious problems outside of the United States with products that affect Americans should be reported to NHTSA. We need the authority to do that.

Mr. FOSSELLA. The last question, Doctor, is that you mentioned before a lot of the regulatory reforms that I guess were talked about in the 1970's, and I believe if I heard you correctly, you said they were not implemented because of the cuts in the 1980's. Have there been any of these regulatory changes that were proposed in the 1970's done in the last, say, 7 or 8 years?

Ms. BAILEY. Of the ones we mentioned, no.

Mr. FOSSELLA. So it wasn't anybody's fault. Again, I am not trying to point fingers here. They were proposed in the 1970's; you said they weren't implemented in the 1980's. Presumably, you would have had the power—not you personally but the agency—in the last 4 to 7 years, and that wasn't done, right?

Ms. BAILEY. That was not done.

Mr. FOSSELLA. Thank you very much.

Mr. TAUZIN. The Chair recognizes the gentleman from Illinois, Mr. Rush.

Mr. RUSH. Thank you, Mr. Chairman.

I know that you have been here for probably longer than you would have liked to have been, and hopefully this will be very brief.

My first question to you is, why has NHTSA allowed Ford to sell tires that can be filled to PSI beyond the Federal testing standards? If that is the case, then why is that the case?

Ms. BAILEY. You mean Ford's recommendation to set it at 26 pounds per square inch rather than above 30?

Mr. RUSH. Right.

Ms. BAILEY. There is not, to my knowledge, a mechanism in place that would allow us to interfere with that kind of a recommendation, but I think it is a valid point and something I would like to review.

Mr. RUSH. Do you think that there is possibly some type of regulatory initiatives that you would be able to undertake?

Ms. BAILEY. There may be, but I think the question is really one for Firestone, too. They produced the tires and recommended that they be inflated at a higher rate, so that is where perhaps the question—the answer would lie.

Mr. RUSH. Okay. If you had known in 1997 or 1998 about the Middle East and the recall in the Middle East and also Venezuela, can you comment on what you think that your agency might have done had you had that information?

Ms. BAILEY. I would have initiated an investigation.

Mr. RUSH. Do you think—what do you recommend that this Congress do to assist you in terms of giving you more statutory authority or regulatory authority to ensure that this problem doesn't reoccur in the future?

Ms. BAILEY. I hope to very quickly determine what our regulatory authority is, and if we don't have enough, I would want to work with Congress to get a statutory remedy for that.

Mr. RUSH. Thank you, Mr. Chairman. I yield back.

Mr. TAUZIN. I thank the gentleman.

The Chair recognizes the gentleman from Oklahoma, Mr. Largent.

Mr. LARGENT. Thank you, Mr. Chairman.

Dr. Bailey, welcome to Washington. I hope you brought a dog. This is kind of baptism by fire, I think. My colleague from Illinois said that you have probably been here longer than you had hoped. I would say just the opposite. I wish you had been at NHTSA longer than you have and that your organization would have sent somebody that actually had been in place that we could ask questions of here today.

Why would the National Highway Traffic Safety Administration send somebody that has only been there for 3 weeks?

Ms. BAILEY. I hope because they have confidence not so much in me but in the wonderful staff at NHTSA who work diligently to provide safer highways for Americans.

Mr. LARGENT. Well, unfortunately, we don't get to question staff, we just get to question you, and I think that it was a poor decision by NHTSA to send somebody that has only been there for 3 weeks, so I apologize to you for kind of throwing you into this. But I do have some questions based upon your testimony that you submitted to this committee.

Earlier, one of my colleagues asked you about a data base that you received called FARS, Fatality Accident Reporting System. My question to you, in your testimony it said on page 4, we opened a preliminary evaluation on May 2, 2000. At that time, the agency was aware of 90 complaints, including reports of 33 crashes and four fatalities. Those figures, 90 complaints, 33 crashes, four fatalities that initiated the preliminary evaluation on May 2, were some of those statistics derived from this data base called FARS?

Ms. BAILEY. No. They were all complaints that were received in the normal fashion. No. To my knowledge, they were not part of the FARS data, that that is information that was obtained in the usual fashion.

Mr. LARGENT. Okay. Then that leads me to this question. It seems to me some of my colleagues have alluded to the problem that at NHTSA really was that you did not have enough information. I would suggest that maybe you had too much information. Because my question then goes back to this FARS, Fatality Accident Reporting System, that contains all vehicle-related fatalities reported to NHTSA by law enforcement.

Mr. TAUZIN. The committee will please be in order. There is a buzz.

Would the gentleman restate his question?

Mr. LARGENT. What the heck do you guys do with this data base that is reported to you by statute from all of the law enforcement agencies around the country? What do you do with this? Because in, let's see, it says from 1998, from the end of 1998, you had information in that data base given to the National Highway Traffic Safety Administration that there were 29 fatalities from accidents in a Ford Explorer fitted with Firestone ATX, ATX II, or Wilderness tires. What is the problem there? You have all of this information from 1998, and yet it takes—you either ignore this or don't look at it, or what happens to this information?

Ms. BAILEY. The 1998 data you are referring to is the State Farm data?

Mr. LARGENT. No, I am not. I am referring to the FARS, Fatality Accident Reporting System, that you had access to at the end of 1999 that reported 29 fatalities from accidents in a Ford Explorer fitted with Firestone ATX, ATX II, or Wilderness tires that the agency had access to. What is going on with that data base? What are you doing with it?

Ms. BAILEY. I assume that is included in the information of the 46. I will provide that for the record and ascertain the answer to your question.

Mr. LARGENT. Do you understand what I am saying? In other words, you had this information a year ago.

Ms. BAILEY. I think that is part of the data base.

Mr. TAUZIN. Would the gentleman yield for a second?

Mr. LARGENT. Sure.

Mr. TAUZIN. The 46 instances that you keep referring to are complaints from consumers who called in and reported incidents to you, correct?

Ms. BAILEY. Correct.

Mr. TAUZIN. What Mr. Largent is referring to is a law enforcement reporting system that reported to you, separate of any constituents or consumers' reporting, 29 deaths related to Ford Explorers fitted with these Firestone tires, and that information was available to you as early as—when was that?

Mr. LARGENT. In 1999.

Mr. TAUZIN. In 1999. It was a 1998 statistic. The question he is asking is, why didn't that trigger action by the agency?

Ms. BAILEY. If, in fact, that information is totally separate from the data that we received in that year, 1997, which did include the information I referred to in that decade, then I would want to know why that information was not combined in the data base. But there is the possibility that it is. I will take that for the record and ascertain exactly what happened to that information and whether or not it overlaps with the——

[The following was received for the record:]

Yes, the there are two separate data bases. However, the FARS database did not, and does not, indicate the manufacturer, brand, or model of tire that was on any of the vehicles involved in a fatal crash. Thus, there is no way to search FARS to see if any particular brand or model of tire is over represented in fatal crashes.

After the Office of Defects Investigation (ODI) decided to open its investigation into Firestone tires, and after the agency became aware that most Ford Explorers were originally equipped with the tires under investigation, ODI worked with the staff of NHTSA's National Center for Statistics and Analysis (NCSA) to identify fatal crashes in FARS involving Ford Explorers in which the item "tires" was listed as a related factor. This was done because ODI wished to ascertain whether the tires on those vehicles were covered by the investigation. That effort is ongoing.

The questions raised by the Committee suggest a need to consider linking the FARS data base and the consumer complaint data base, if such a linkage would improve NHTSA's ability to detect safety-related defects. A related question is whether changes in either data base could increase the benefits of such a linkage.

Mr. TAUZIN. Steve, if you will yield again, I want you to get a picture of our frustration with this system. Here we have an agency that is receiving independently by 1998, by your testimony, about 30 complaints of tire failures, most of them separations leading to serious injuries or accidents, what have you. You have a State Farm report that is filed to your office with another 21 incidents, two fatalities. You have a FARS report coming in from the law enforcement agency saying 29 fatalities. You are getting an awful lot of information. Mr. Largent is pointing out that you are getting a heck of a lot of information that something is terribly wrong out there. People are dying in Ford Explorers outfitted with these Firestone tires. Nothing happens until a station in Houston, Texas, runs an expose on it in 2000.

The frustration we all have with this is the argument your agency is making that you weren't getting enough information. You were getting information by people dying on the highways constantly from State Farm, from FARS, from individual complaints to your agency, and nothing happens. And the concern we all have is, why didn't that trigger something happening? Why was five complaints without a fatality in 1994 enough to trigger an investigation, but all of this information was not?

There is something—there is a disconnect here that I don't understand, and I can't for the life of me understand why anybody in America could understand it today. And if we are going to move from this place to a place where it doesn't happen again, we have to understand what broke down. Why did this e-mail get filed away? Why did this FARS report get ignored? Why wasn't there somebody at the agency looking at all of this information together and understanding that there was something awfully wrong on the highways of America and that something ought to be done about it?

I know you can't answer that. That is what frustrates us, that we don't have a good answer to that.

I thank you, Steve. I am sorry, I got a little excited. But we are talking about, again, life and death, and I don't know how many people—Mr. Wynn said it—how many people died unnecessarily because the recall didn't come until 2000, when it could have come in 1998 if somebody had been awake and not asleep at the switch somewhere. Thank you, Steve.

Mr. LARGENT. Do I have any time left, Mr. Chairman?

Mr. TAUZIN. The Chair will extend the gentleman's time.

Mr. LARGENT. Thank you very much.

Let me say that, in conclusion, I would just like to say that I appreciate where we are today. My chief of staff has a Mercury Explorer-like car with these tires on it, just got them taken off. Has a little baby that is just turning a year old, so I am glad where we are at now. The question is why we couldn't have been there sooner and if, in fact, as the chairman mentioned, we could have avoided some of the tragedies that have occurred over the last 12 months.

My question, Dr. Bailey, would be, what, if anything, will the National Highway Traffic Safety Administration do differently as a result of this experience?

Ms. BAILEY. We will be answering some of the questions that are asked here today. I am asking those same questions. I will certainly look into the FARS data as to whether or not there is an overlap between our data base and that information. As I have indicated, we clearly need in a global marketplace to have information from around the world. We are seeking to do that. We will find a remedy for that, and we will find a way to obtain claims information that would have let us have the knowledge that would have initiated an investigation sooner.

Mr. LARGENT. Thank you, Mr. Chairman. I yield back.

Mr. TAUZIN. I thank the gentleman.

If there are no further requests for time, Dr. Bailey, let me again thank you. I know this was hard on you for only 3 weeks on the job. You have, in my opinion, done a very remarkable job considering those circumstances.

Please tell your boss hello for us. I wish he had come today.

You are dismissed.

Ms. BAILEY. Thank you.

Mr. TAUZIN. The Chair will now call the second panel.

Before I do, let me make an announcement. There will be votes at 6 o'clock, ladies and gentlemen. There will be a series of three votes on the House floor. We will get interrupted for that vote, and then we will come back and continue the hearings until we complete them. I apologize for the length of the hearings to all witnesses, but this is again awfully serious business.

We will call the second panel, which consists of Mr. Masatoshi Ono, Chief Executive Officer of Bridgestone/Firestone, Incorporated; accompanied by Mr. Gary Crigger, Executive Vice President for Business Planning; and Mr. Robert Wyant, Vice President of Quality Assurance.

Before we begin the testimony, I will recognize the gentleman from Michigan to administer the oath. I believe you have to stand up to do it. I failed to do that.

Mr. Upton is recognized to administer the oath of truthfulness.

Mr. UPTON. Gentlemen, as you understood from the first panel, we have a long-standing tradition of taking testimony under oath. Do you have any objection to that?

Mr. ONO. No.

Mr. UPTON. The committee rules also allow you to have counsel if you want, counsel to help represent you. Do you desire to have counsel represent you?

Mr. CRIGGER. We are advised by——

Mr. UPTON. If you could just announce his name for the record.

Mr. SMITH. I am Colin Smith of the law firm of Holland & Knight.

Mr. UPTON. Okay. If you would raise your right hands.

[Witnesses sworn.]

Mr. TAUZIN. Thank you, Mr. Upton.

Mr. Ono, you are recognized to give your statement, sir. Your written statement is a part of the record, and you have 5 minutes to summarize that statement at this time.

TESTIMONY OF MASATOSHI ONO, CHIEF EXECUTIVE OFFICER, BRIDGESTONE/FIRESTONE, INC.; GARY B. CRIGGER, EXECUTIVE VICE PRESIDENT, BUSINESS PLANNING; AND ROBERT J. WYANT, VICE PRESIDENT, QUALITY ASSURANCE

Mr. ONO. Chairman Tauzin, Mr. Upton and members of the committee, thank you for providing me with this opportunity to appear before you here today. I have practiced my speech so that I may deliver it in English. However, I must use the translator and two of my senior executives to respond to questions. I am 63 years old, and I have never made a public appearance like this before, so I am more than a little bit nervous.

As Chief Executive Officer, I come before you and apologize to you and the American people, especially for the family they have lost, loved ones, in these terrible rollover accidents. Also, I come to accept full and personal responsibility on behalf of Bridgestone/Firestone for the events that led to this hearing. Whenever people are hurt or fatally injured in automobile accidents, it is a tragedy. Whenever people are injured while riding on Firestone tires, it is cause for great concern among Bridgestone/Firestone management and our 35,000 American employees.

On August 8, we met with the National Highway Traffic Safety Administration. We reviewed what we knew at that time about the performance of the tires which are associated with tread separations and accidents primarily on the Ford Explorer vehicle.

On the following day, August 9, Bridgestone/Firestone announced a voluntary safety recall of 6.5 million tires.

Since that time, our highest priorities have been to complete the recall as quickly as possible and to determine the root cause of the tire failures.

At this time, we have replaced nearly 2 million of the recalled tires. We have maximized worldwide production of replacements for tires that have been recalled. To speed up the process, we are using our competitors' tires and airlifting additional replacement tires; and these shipments will continue as long as necessary.

We have a team working around the clock using all our available resources to try and determine the root causes for the tire problem. We are reviewing every aspect of our manufacturing and quality control processes. This includes microscopic examination of many recalled tires. In addition, we are working with Ford Motor Company and experts to thoroughly examine every possible cause.

Unfortunately, I am not able to give you a conclusive cause at this time. However, you have my word that we will continue until we find the cause.

While we search for the root cause, we are also undertaking the following actions:

First, we will appoint an outside independent investigator to assist in tire analysis and determine the root cause of the tire problem we have experienced. We are taking this action to help assure you and the public that Firestone tires are reliable in the future.

Second, we will fully cooperate with this committee about the safety as well as problems that have occurred with our tires. We will release data and information in order to assure consumer safety with our products.

Third, we are accelerating the rollout of a nationwide consumer education program. The program will be run through more than 7,000 company stores and Firestone dealers. It will provide consumers with information on proper tire maintenance through the use of in-store videos, showroom displays, brochures, windshield tags, and tire pressure gauges.

Fourth, we pledge to continue working with NHTSA toward developing early understandings and complete reporting of accidents and developing approaches that make it easier for drivers to determine tire pressure.

In closing, I would like to ask two of my senior executives to join me so that we can more efficiently respond to your questions. Mr. Gary Crigger is Executive Vice President of Business Planning, and Mr. Bob Wyant is a Vice President of Quality Assurance.

Thank you, Mr. Chairman.

[The prepared statement of Masatoshi Ono follows:]

PREPARED STATEMENT OF MASATOSHI ONO, CHIEF EXECUTIVE OFFICER, BRIDGESTONE/FIRESTONE, INC.

On August 9, 2000, Bridgestone/Firestone, Inc. (“Firestone”) voluntarily recalled an estimated 6.5 million tires manufactured by Firestone in North America in the 1990s. Firestone undertook this massive effort in the interest of public safety and in cooperation with Ford Motor Company and the NHTSA.

The recalled tires, all P235/75R15 Firestone Radial ATX and ATXII tires manufactured in North America and P235/75R15 Firestone Wilderness AT tires manufactured at its Decatur, Illinois plant, have been used for most of the last decade as original equipment on light trucks and sport utility vehicles, including the popular Ford Explorer.

Because of the safety issues involved, Firestone chose not to limit the recall to a particular manufacturing period or to tires sold only in the last few years. Instead, Firestone is replacing its customers’ tires or reimbursing customers who purchase competitors’ tires, no matter how old and high mileage their recalled Firestone tires might be.

A small percentage of recalled tires have experienced tread belt separations in a number of serious accidents. It should be kept in mind that all steel belted radial tires will ultimately experience tread belt separation if pushed to their limits. Tread belt separations are usually caused by damage to the tires, improper repairs, overload, underinflation, or simply by using tires with excessive wear. However, such separations can also be caused by defects. We are searching hard to determine whether there was a design or manufacturing cause of these tread belt separations. We believe the vast majority of the recalled tires are safe, but the incidents and injuries involving these tires led to the recall.

Since the recall was announced, there has been strong public reaction, most of it negative. Firestone has received substantial criticism, including claims of shoddy manufacturing processes and attacks on the quality of our workforce. Class action lawsuits have been filed asking courts to order changes in the scope or timing of the recall. Interest groups aligned with parties adverse to the tire industry have urged that Firestone recall up to 34 million additional tires, despite a lack of *any* basis for such a massive recall.

The facts are that Firestone’s actions in early August were both timely and adequate. Indeed, a more limited recall of tires would have been justified, but Firestone broadened the recall to assure safety and consumer confidence.

Firestone vigilantly monitors data on the in-service performance of its tire lines. We do product testing; we study warranty adjustment data; and, where possible, we analyze failed tires returned from the field. All these indicators showed satisfactory performance on the part of these tires. The ATX, ATXII and Wilderness AT tires passed design, development and Federal Motor Vehicle Safety Standard testing, as well as Ford’s development and test track requirements. Our warranty returns and adjustment data place these tire lines roughly in the middle of all our lines. And, our analysis of failed tires has shown that failures were caused by external damage, by improper maintenance, or by operating with tire pressure significantly below the 26 psi level recommended for the Explorer by Ford.

Historically, Firestone has not used property damage and personal injury claim data as a reliable indicator of tire performance. There are generally not a sufficient number of claims from which to draw meaningful conclusions. However, because of the growing number of failure reports this summer and the lack of any indication of problems using the traditional methods of assessing performance, Firestone analyzed the claims data in a joint effort with Ford, and the analysis showed a substantial number of claims in the P235/75R15 size and an overrepresentation of tires produced in the Decatur plant. That analysis, coupled with reports of serious accidents involving tread belt separations on Ford Explorers especially in hot climate states led Firestone to decide on August 8, 2000, to conduct a voluntary recall for customer safety reasons.

To reiterate, Firestone has not historically relied upon property damage and personal injury claims data in analyzing our tires' performance. Property damage claims do not involve injuries or death. They are claims people make, usually for vehicle damage, and most of them never become lawsuits.

Firestone certainly knew there had been accidents and injuries involving tread belt separations of our tires on Ford Explorers. Company and outside experts had examined tires involved in a number of those accidents. Again, those analyses did not suggest any problem with the tires. It was only when we focused on the property damage and other accident claims data that we saw the potential problem with the tires we ultimately decided to recall.

Working together with Ford, Firestone has taken extraordinary measures to speed up the recall by urging other tire manufacturers to ramp up production, by airlifting tires from Japan, and by significantly increasing the output of American plants. Firestone is also reimbursing customers who replace recalled tires with competitors' brands.

Firestone welcomes the opportunity to set the record straight in its testimony before the Committee. To that end, Firestone has given the Committee the documents produced to the NHTSA and the Company's responses to questions asked by the Committee's investigative staff. This testimony also provides further background information regarding the manufacture and use of tires and the reasons for and status of the recall.

I. STEEL BELTED RADIAL TIRES AND TREAD BELT SEPARATIONS

Since its introduction in the 1970s the steel belted radial tire has become the predominant tire used on American vehicles, including passenger cars, light trucks and sport utility vehicles. The term "steel belted radial" refers to a tire that includes within the body of the tire multiple steel belts that provide support for the tread and stability to the tire. Steel belted radial tires are manufactured in layers encased in "skim stock," or rubber compound. Once the layers are assembled in the tire manufacturing plant, the tire is "cured," a process involving the application of heat and pressure to the raw or "green" tire. What emerges from the curing mold is the finished tire, which is fully inspected before it leaves the factory.

The manufacture of steel belted radial tires is a complex procedure utilizing a host of raw materials, assembly procedures, and other processes. Steel belted radial tires have provided the American driving public with literally hundreds of trillions of miles of safe service. However, unlike most of the components of a vehicle, tires are subjected to continuous severe operating conditions because they are always in contact with the road. Tires fail and tires wear out. This is why vehicles are sold with spare tires and why in 1999 alone more than 270 million tires removed from service were disposed of the United States.

If a steel belted radial tire is damaged or improperly maintained, the inner components of the tire may begin to separate, particularly when there is excessive heat build-up within the tire, which is most commonly caused by underinflation. The causes of underinflation are numerous, and include punctures, road hazards, improper repairs, and simple lack of maintenance. A steel belted radial tire operated in a chronically underinflated state will tend to show inner component breakdown, eventually leading to a tread belt separation.

Tread belt separations do not often lead to accidents. In most situations, drivers are able to bring their vehicles to a safe stop on the side of the road. In some tread belt separations and other tire disablements, drivers do lose control, and accidents, including vehicle rollovers, can occur. If the driver in this situation has taken the all important, and in most states mandatory, precaution of fastening the safety belt, even vehicle rollovers are less likely to cause serious injury or death.

II. THE PERFORMANCE AND SAFETY RECORD OF P235/75R15 FIRESTONE RADIAL ATX, ATXII AND FIRESTONE WILDERNESS AT TIRES

A. General Production Numbers and Usage of ATX and Wilderness Tires

Firestone manufactured the P235/75R15 Radial ATX tires from the mid-1980s until this year. This tire type was approved as original equipment on the initial Ford Explorer. The approved application was designed and manufactured to performance specifications provided and approved by Ford. When Ford redesigned the Explorer in 1994, Firestone redesigned the tire, again to Ford's performance specifications. Further vehicle design changes in 1996 led to the new P235/75R15 Wilderness AT tire, which replaced the Radial ATXII at approximately that time. Firestone estimates that it has manufactured more than 20 million Radial ATX and ATXII and Wilderness AT tires in the P235/75R15 size.

The Radial ATX and Wilderness AT lines have been used primarily for all-terrain sport utility vehicles. Approximately seventy percent of Firestone's production was manufactured for original equipment installation primarily on Ford Explorers. The other thirty percent was devoted to replacement tires used primarily on Explorers and other SUVs.

Because of the solid field performance of the ATX and Wilderness lines on the popular Ford Explorer, Firestone's first notice of a lawsuit involving a claimed tread belt separation and Ford Explorer rollover was in 1995. This case was ultimately tried to a defense verdict in favor of both Ford and Firestone in Phoenix, Arizona.

B. Traditional Tire Industry Measuring Sticks for Field Performance

Since tires are constantly being changed, repaired, and replaced, the tire industry has developed guidelines for tracking field performance, commonly known as "tire adjustment data." An "adjustment" occurs when a customer discovers. for example, uneven or unusual wear on a tire, and brings the vehicle to a tire dealer or store asking for a new or replacement tire. Depending on the reason for the customer dissatisfaction, the retailer "adjusts" the tire by providing the customer with either a new replacement tire or by offering a discount on the customer's purchase of a replacement tire.

In Firestone's system, the retailers track and record this adjustment information, using various adjustment codes for different tire conditions. Tread belt separation is a common reason for adjustments on steel belted radial tires.

Adjustment data provide Firestone with a reliable measure of actual field performance of a particular tire. In contrast, data concerning property damage claims and lawsuits, because of the relatively small numbers of such incidents, are not viewed as reliable indicators of a tire's performance in the field.

Adjustment data for the tires that are the subject of Firestone's recall were within the historically low range of all Firestone tire products, including the adjustments for tread belt separations (Charts 1 and 2). In addition, the number of claims that had been made against Firestone on these tires was consistent with the-high volume of production and sales and with the vehicle application. On the lawsuit front. as recently as May 31, 2000, Firestone had been notified of 71 lawsuits involving tread belt separations of ATX or Wilderness AT tires.

Any incident of personal injury or death involving a Firestone product is a matter of great concern to the Company. As previously noted, however, tread belt separation is essentially an inevitable characteristic of tire use in normal service, no matter how well the manufacturer designs and produces the tires. In a large production tire line or type, there will be incidents of tread belt separations and, in America's litigious culture, damage claims.

The P235/75R15 tires in question are an exceptionally large population. The approximately 15 million Firestone tires used on the Ford Explorer are the largest single vehicle application in Firestone's history and perhaps the largest in automotive history. (Vehicle manufacturers do not often "single source" to the extent Ford has with this popular vehicle.) In such a vehicle population, particularly one involving all terrain tires and the unique loading and hard service of sport utility vehicles and light trucks, some number of tread belt separation incidents and claims would be fairly expected.

Additionally, these types of vehicles present risks and accident severities different from ordinary cars. Rollover accidents present an enhanced potential for injury and death, particularly and principally when occupants do not wear seatbelts.

In February 2000, television station KHOU ran a report on tread belt separations of Firestone ATX and Wilderness tires and their involvement in Ford Explorers rollovers. Following that news broadcast, Firestone received an increased number of claims and lawsuits, the most serious of which seemed to be occurring in the warmest climates in the United States. In May of this year, the NHTSA began a Preliminary Evaluation of certain tires including the radial ATX and Wilderness AT lines. Following the commencement of that May 2000 Preliminary Evaluation, Firestone received notice of an even larger number of claims and lawsuits allegedly involving tread belt separations on Firestone tires, predominantly tires mounted on Ford Explorers. Meanwhile, however, the historical adjustment data relied upon by the tire industry and by the NHTSA to track tire performance continued to indicate that these particular tires did not raise any type of safety issue.

III. THE REASON AND BASIS FOR THE RECALL

In July 2000, Firestone provided the NHTSA with adjustment data, data on property damage claims, data on claims for personal injury and lawsuits, and related information regarding the history of the Firestone tire products that were the subject of the Preliminary Evaluation. Ford requested that Firestone provide Ford with the same information on claims and adjustments. Ford then performed a statistical analysis using Firestone's data. Rather than focus on adjustment data, that analysis focused instead on the smaller and less representative universe of data arising from property damage and personal injury claims. The conclusion drawn by Ford and Firestone from this analysis was that the tires that eventually became the subject of the recall were overrepresented in the claim data. (Chart 3) Tires manufactured in the Decatur plant were also overrepresented.

Given the number of serious accidents involving tread belt separations that surfaced after the onset of the NHTSA preliminary evaluation, and after Firestone reviewed the data analysis as presented and compiled by Ford during the first week of August 2000, Firestone decided, in conjunction with Ford and after advising the NHTSA, to initiate the voluntary recall that is the subject of this hearing.

What that means is that Firestone stepped out of historical tire industry product performance evaluation procedures and relied upon a different form of data to initiate this safety recall. Taking into account the immense popularity of the Ford Explorer and the high number of these vehicles on America's roads, Firestone determined that in the interest of customer and public safety, it should immediately announce a recall of the overrepresented tires. Firestone acted immediately upon its receipt and review of these factors and did not delay the announcement or initiation of the recall for any reason.

Firestone also initiated the recall without identifying or pinpointing any particular cause or explanation for the apparent anomalies in the claim data. In fact, as mentioned above, Firestone's forensic review of tires returned from the field over the past several years and allegedly involved in such accidents indicated that the treads separated from these tires not because of a design or manufacturing defect, but for particular reasons such as underinflation, punctures, improper repairs, and other general maintenance problems. Thus, none of the yardsticks typically relied upon to measure tire performance indicated that the recalled tires were unsafe. But Firestone decided to proceed with a recall given the heightened concern for the safety of its customers and the motoring public.

IV. FIRESTONE'S ROOT CAUSE EVALUATION

Firestone decided that it would recall the tires in the overrepresented population instead of waiting to perform an analysis as to why the data showed what it did. Immediately following the recall announcement, Firestone has devoted many employees to the task of reviewing the manufacturing practices and processes of the recalled tires, as well as all other available data to determine a root cause of failures of the tires. Along with Ford, Firestone has analyzed the design and development of the tires at issue, intensively evaluated processes at the Decatur plant, and is now in the process of cutting and inspecting recalled tires, all in an effort to determine the root cause of the tire failures at issue. Ford and Firestone have also conducted a review of Firestone's Technical Center in Akron.

As of the submission of this testimony, Firestone's evaluation is not complete. Firestone is considering all potential factors at this time, including plant operations in the 1994-1995 time period. While Firestone is anxious to complete its root cause evaluation, Firestone realizes that it is of utmost importance that the Company not rush to any judgment.

V. RECALL/REIMBURSEMENT DETAILS

Firestone is replacing recalled tires as quickly as possible and has been since the day the recall was announced. Rather than wait until we had sufficient tires in inventory to replace the recalled tires, we went forward with the recall on August 9, 2000, out of deep concern for customer safety.

There has been some confusion about the recall program. While we are assuring adequate shipments of replacement tires to the Southern and Southwestern states where more than 75% of the reported accidents have occurred, we are shipping tires to all states. Working together with Ford, Firestone has taken extraordinary measures to speed up the recall by urging other tire manufacturers to ramp up production, by airlifting tires from Japan and by significantly increasing the output of American plants.

Customers whose recalled tires are replaced at one of our 1,500 Company stores, 8,500 authorized retailer locations, or 3,000 Ford, Mercury and Mazda locations, will have their tires replaced, mounted and balanced at no charge, with no taxes charged.

If the customer elects to purchase competitive tires as replacements for the recalled tires, Firestone will reimburse purchase costs, up to $100.00 per tire, an amount Firestone believes to be fair and reasonable. In the reimbursement situation, the customer needs to obtain and keep a receipt or invoice from the supplier of the tires, return the recalled tires to a Company store, authorized retailer or auto dealer location, obtain a recalled tire surrender receipt, and mail the appropriate documents to Firestone.

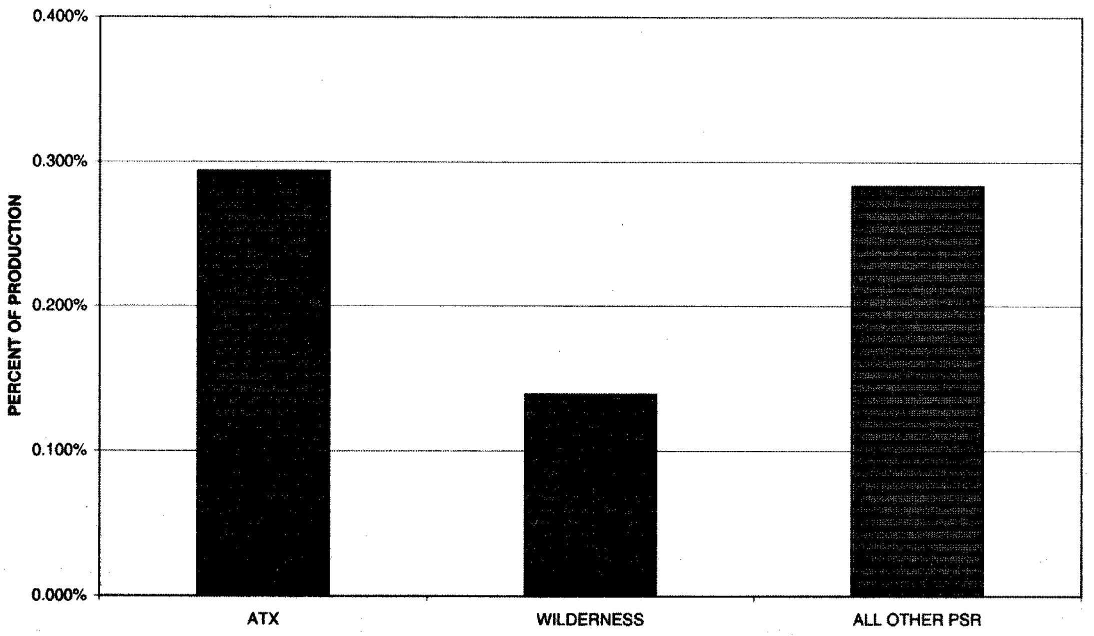
Firestone estimates that nearly 1.5 million tires have been replaced in the first month of the program. Firestone is committed to customers' safety and urge all drivers to keep their tires inflated to the level specified by the vehicle manufacturer. For drivers of Ford Explorers and Mercury Mountaineers with this size tire we are recommending an inflation of 30 psi.

VI. CONCLUSION

Firestone acted promptly and responsibly in this difficult situation. It has cooperated and will continue to cooperate fully with the NHTSA and with this Committee.

Chart 1

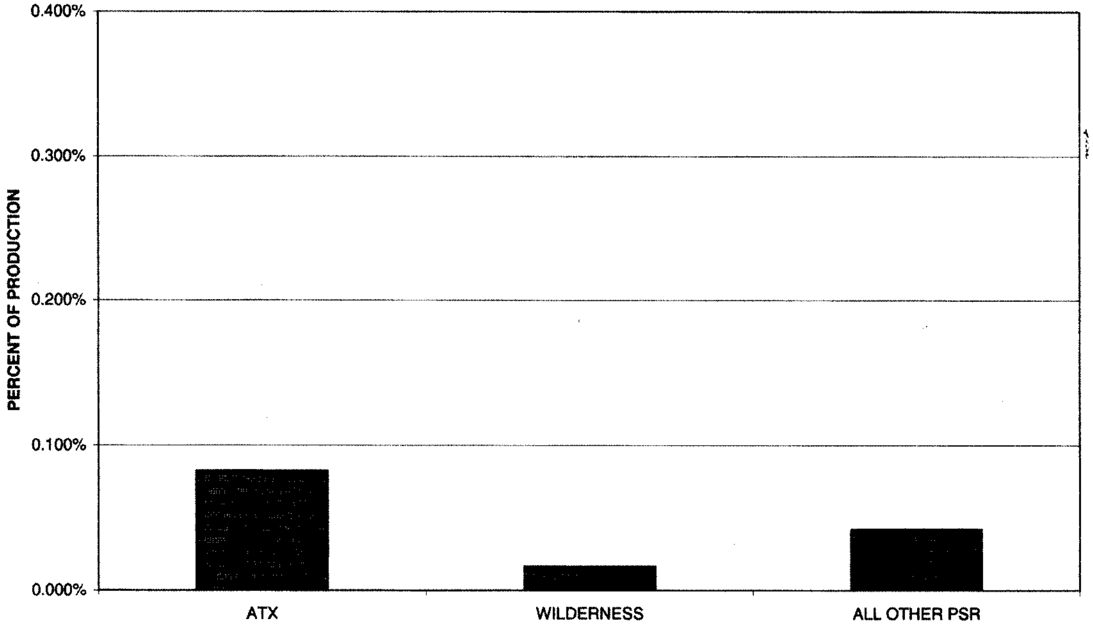
FIRESTONE PASSENGER RADIALS
ADJUSTMENT RATE - ALL CONDITIONS
PRODUCED AND ADJUSTED 1/1991 THROUGH 3/2000



8/28/2000

Chart 2

FIRESTONE PASSENGER RADIALS
ADJUSTMENT RATE - TREAD/BELT CONDITIONS
PRODUCED AND ADJUSTED 1/1991 THROUGH 3/2000



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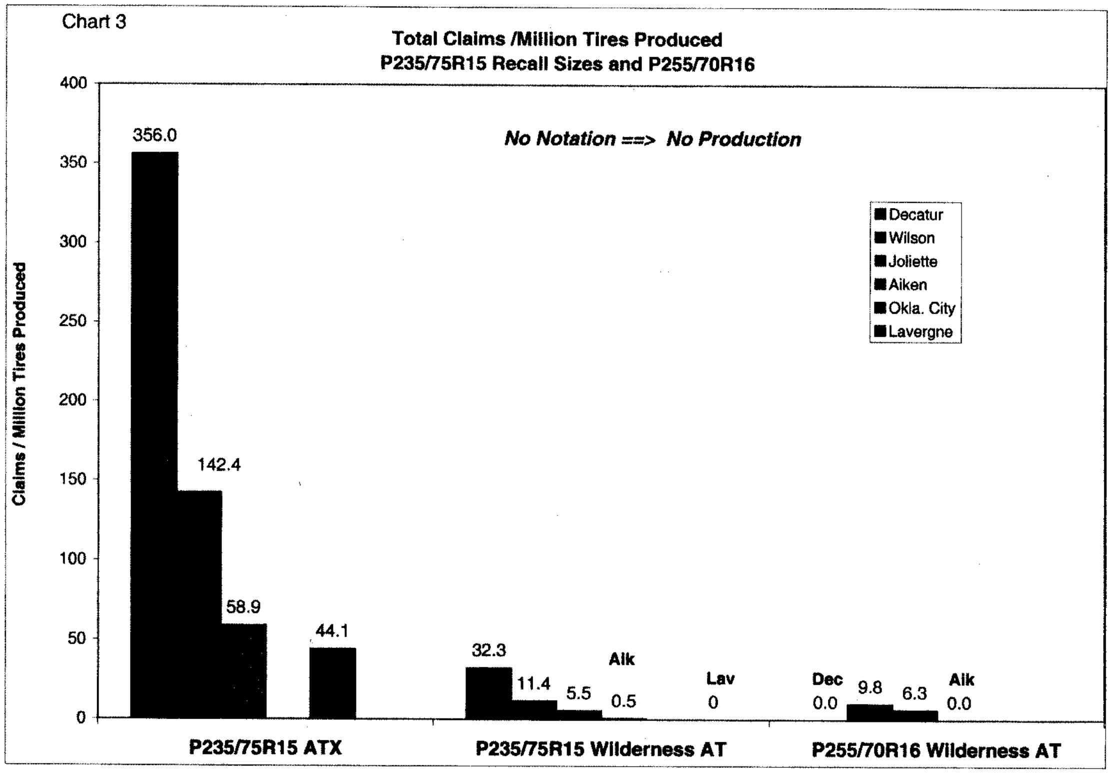

Chart 3

Total Claims /Million Tires Produced
P235/75R15 Recall Sizes and P255/70R16

Mr. TAUZIN. Thank you, Mr. Ono.

Mr. Ono, the one thing you didn't commit to do is to agree to recall the 1.4 million tires that NHTSA has announced just a minute ago should be recalled in their opinion. Why not?

Mr. CRIGGER. I believe I can address the question, Mr. Chairman. The requested recall on the 1.4 million tires involve several populations of tires and the use of claims data, in some cases where only one claim was made against an entire population of tires. We are looking at all of those. We are trying to analyze what should happen in all of those cases. We don't think that we have at this point a standard based on claims that would be relevant to that population. Many of those tires are tires that are used in hard service and different conditions, and the claims represent claims, not necessarily defects, and we need to investigate those before we can make a determination.

Mr. TAUZIN. Now, our investigators for a week now have been requesting information from your company as to what tests were run on these Firestone tires. Specifically, we have been requesting information as to whether Firestone ever speed-tested these Firestone tires on a Ford Explorer under conditions of 26 pounds per square inch pressure. Your company as of last night informed us that it couldn't tell us what tests were run and what were not run. Is that correct?

Mr. CRIGGER. I believe I should defer to Mr. Wyant for that answer.

Mr. TAUZIN. Mr. Wyant.

Mr. WYANT. I am not certain that I understand your question.

Mr. TAUZIN. Let me be clear. We have asked you for a week to tell us what tests were run on these Firestone tires under speed conditions and 26 pounds per square inch. As of last night your folks informed our investigators that they could not give us this information. Is that correct and why not?

Mr. WYANT. I heard you say "on a vehicle," and that is why I asked you to repeat the question. The question, as I understand it, is a request for data on high speed testing, and certainly we have done high speed testing.

Mr. TAUZIN. We have asked for a week now for documents identifying what tests were run at high speed, if any. You have not provided them to us. As of last week we were told you could not provide them at this time; is that correct?

Mr. WYANT. My understanding is that we have provided computer printouts.

Mr. TAUZIN. Let me make a request upon you and ask for your commitment. This committee has the power of subpoena and I can put it to a vote if necessary. I would rather not do that. I would rather your company at this moment commit to us to give to this committee the records of all speed tests done on Firestone tires at 26, 30, 32 and 35, whatever pounds per square inch they were tested, from 1990 to the present time.

Mr. WYANT. We will certainly give this committee any data that they request.

Mr. TAUZIN. Do we have a commitment that we will receive it?

Mr. WYANT. Yes.

Mr. TAUZIN. I do not have to subpoena it?

Mr. WYANT. You do not have to subpoena us for any of this information.

Mr. TAUZIN. Did you test Firestone tires under speed conditions at 26 pounds per square inch?

Mr. WYANT. I cannot confirm that, and that is what this around the clock search has been because there are numerous high speed tests, as mentioned by Dr. Bailey. There are different standard tests which measure high speed characteristics of tires. And then in some cases, limited cases, they are high-speed tested or there are tests that are conducted at application inflation.

Mr. TAUZIN. So the answer is you don't know? And we will only know once you submit the documents to us?

Mr. WYANT. That's correct.

Mr. TAUZIN. Number 3, we have in our possession a memo from Ford Motor Company in reference to the Saudi Arabian replacement of tires. It reads as follows. "Firestone Legal has some major reservations about the plan to notify consumers and offers them an option. First, they feel that the U.S. DOT will have to be notified of the program since the same product is sold in the United States."

Is that report in this Ford memo accurate?

Mr. CRIGGER. I am not aware of the particular meeting or comments, but I do know that in Saudi Arabia the action was taken by Ford and it was taken as a customer satisfaction issue.

Mr. TAUZIN. Was the position of Firestone Legal in 1999, when this action was taken, that one of the reasons you didn't want to assume responsibility for a recall in Saudi Arabia was the concern that the Department of Transportation officials in the United States would find out about it?

Mr. CRIGGER. No, sir. I am not aware of the Legal Department's opinion on that issue.

Mr. TAUZIN. You were not aware of it. Mr. Ono, were you aware of it?

Mr. Wyant, were you aware of it?

Mr. Ono, have you answered? Were you personally aware of your Legal Department's position that it didn't want DOT to find out about a recall in Saudi Arabia?

Mr. CRIGGER. Mr. Chairman——

Mr. TAUZIN. It is document number 39 in the book if you wish to refer to it.

[Mr. Ono's responses are through an interpreter.]

Mr. ONO. That I am not aware of.

Mr. TAUZIN. Mr. Wyant, are you aware of it?

Mr. ONO. I was not aware of that, but I was informed that there was a recall in Saudi Arabia for customer satisfaction reasons.

Mr. TAUZIN. Mr. Wyant, are you aware of the position that the Ford document refers to that Firestone was concerned about DOT finding out about a recall in Saudi Arabia and therefore preferred not to have a formal recall?

Mr. WYANT. I am not aware of that discussion and did not participate in it. I am aware that there were some discussions. That was through counsel, I believe.

Mr. TAUZIN. So you were aware that there were discussions about not agreeing to a recall because it would trigger information to DOT?

Mr. WYANT. I am not aware of the direction as you state it. I am aware that there was a conversation concerning that reporting process.

Mr. TAUZIN. When were you aware of that?

Mr. WYANT. I have only recently become aware of that.

Mr. TAUZIN. How did you become aware of that?

Mr. WYANT. I was made aware of it this afternoon. I did not participate in that process.

Mr. TAUZIN. Who made you aware of it?

Mr. WYANT. Counsel.

Mr. TAUZIN. So legal counsel for Firestone has now informed you that there were such discussions in 1999 with Ford?

Mr. WYANT. That's correct.

Mr. CRIGGER. Let me correct. I think what legal counsel has informed is that they said that there was a question about this issue, not that that was a position that was taken.

Mr. TAUZIN. Let me try again, Mr. Wyant. What were you informed? Mr. Crigger is apparently editorializing your comments. Tell me what you were informed.

Mr. WYANT. I was simply informed that there was a conversation concerning this subject. That is all I really know about it.

Mr. TAUZIN. So the subject was discussed. Were you informed that Firestone did in fact have a concern about DOT finding out about a recall in Saudi Arabia?

Mr. WYANT. I was not informed about any position of that sort.

Mr. CRIGGER. If I can elaborate. There was no decision by Firestone Legal that impacted the recall in Saudi Arabia or the customer satisfaction action of Ford. There was a joint technical team of both Ford and Firestone that reviewed product in Saudi Arabia and found that there were not conditions, that the conditions present did not indicate any defect in tire.

Mr. TAUZIN. Mr. Crigger, the memo from Ford says that Firestone had two reasons why they were concerned about notifying customers and offering them an option, I assume an option to replace the tire. The first was U.S. DOT would find out about it and the second is that the Saudi government would see it as a recall and react dramatically.

Is this memo accurate?

Mr. CRIGGER. I am not aware of that memo or the meeting. I am aware that Firestone Legal informed us that there was a question about this issue, but not that there was an opinion about the issue.

Mr. TAUZIN. Did Firestone at any point following this recall on its own seek to inform DOT that these tires were being replaced in Saudi Arabia?

Mr. CRIGGER. No. Firestone took no action in Saudi Arabia.

Mr. TAUZIN. Did you read this memo?

Mr. CRIGGER. No.

Mr. WYANT. I have not read that memo.

Mr. TAUZIN. Why don't you take time and read it. It is paragraph 4 of the document.

Mr. Wyant, look at paragraph 4 and you will see the recitation of Chuck Seilnacht, I can't pronounce his name, the recitation of his version of what was going on and why Firestone objected to notifying customers and offering them options to change out tires. Do you want to comment on it? Any one of you. Mr. Crigger?

Mr. CRIGGER. I have no knowledge of this particular issue, but the only comment I have is that the action that was taken in Saudi Arabia was a customer satisfaction action. A team of both Ford and Firestone looked at the tires, made an evaluation that there was no defect involved but there were unusual circumstances. There were circumstances of people reducing air pressure——

Mr. TAUZIN. There were people dying in accidents and Ford auto dealers were calling and complaining about the safety implications of these tires, and you are saying it is a consumer satisfaction issue?

Mr. CRIGGER. But there was no evidence of any defect. Yes, there were failures, but they were due predominantly to underinflated tires, to bad punctures and this sort of activity that was discovered by the technical team.

Mr. TAUZIN. I am going to have to wrap up because we all have time restraints.

Mrs. WILSON. Mr. Chairman, will you yield?

Mr. TAUZIN. I will be happy to yield.

Mrs. WILSON. You say there is no defect and this is all just consumer problems and underinflation. This is an internal Firestone document, which I think you probably recognize.

Can you tell me why it is that so many more consumers were underinflating their tires in 1996 as opposed in other years earlier? What changed in terms of consumer behavior?

Mr. CRIGGER. The response previously was in response to the Saudi Arabia issue.

Mr. TAUZIN. I thank the gentlewoman. Let me ask you quickly. Look at those statistics. Look at the chart. These are your documents. Ms. Wilson has just shown you an internal document of Firestone. There is a huge spike in claims for tire separation. Eighty percent are separation of Firestone tires resulting in serious accidents, injuries, bodily and property damage.

She is asking the question we should all ask. Is that because consumers were changing the inflation on their tires in 1 year out of all of these years?

Mr. CRIGGER. Obviously not.

Mr. TAUZIN. Obviously not. So why do you keep making that claim? Why do you keep telling the American public that it is their fault, that they are inflating their tires wrong when we look at statistics that indicate that something is wrong with the tires.

Mr. CRIGGER. We don't mean to say that it is America's fault. It is not. We are very concerned about all of the incidents that have occurred. We regret terribly what is happening. And if we could have prevented it, we would have prevented it. Unfortunately this kind of data, this kind of claims data——

Mr. TAUZIN. Mr. Crigger, if you weren't so interested in keeping the facts from the Department of Transportation, maybe you would have prevented it.

Mr. Markey is recognized.

Mr. MARKEY. Thank you, Mr. Chairman. I am going to continue down this same line of inquiry so that I can understand what it was in Saudi Arabia that your company did not think was relevant to the American marketplace.

Mr. Ono, what is unique about Saudi Arabian driving that would not be relevant to the American marketplace. Since this vehicle is advertised as an all-terrain vehicle, they are Wilderness tires, what is it about unusual conditions in Saudi Arabia that would be different from how this tire is advertised for use in the American marketplace?

Mr. ONO. Well, the first thing I can mention is the speeds at which the vehicles are driven. We are looking at an average of 100 miles per hour and also I would mention the heat that is involved, that it is hot. Also, I would mention the severely underinflated tires, and I would consider this a major cause.

Coming to the United States, you realize in comparison there is a lack of care for the tires. That would be my conclusion.

Mr. MARKEY. Mr. Ono, are you aware that most of these accidents have occurred in the southern part of the United States? Are you aware that it is very warm in the southern part of the United States?

Are you aware that in many of the areas of the United States, because of the great distances that these vehicles are driven at great speeds and over terrain which would be equal in terms of the test which you would place this tire at, why do you—why did you not in your corporate analysis take the experience which you had in Venezuela and in Saudi Arabia and relate it to the fact that most of these accidents in the United States were occurring in our hot climates, in our more rural areas where they would be used in almost the identical conditions as they were being used in Saudi Arabia and Venezuela?

That is a question for Mr. Ono.

Mr. ONO. First of all, as far as the Venezuela issue is concerned, I would mention that they were primarily locally made tires, so the materials were different. So I would say that they were different.

Also, with regard to Saudi Arabia, I mentioned underinflated tires being used frequently in operation.

Interpreter correction: Correcting the reference made about underinflation, referring to Venezuela as well as Saudi Arabia.

Mr. MARKEY. How does Mr. Ono differentiate?

The INTERPRETER. The interpreter has not finished the interpretation.

Mr. ONO. As far as Saudi Arabia is concerned, there is rough terrain there and so road hazards are very frequent, and for that reason I would not equate the two as being the same.

Mr. MARKEY. Let me speak back to Mr. Ono again. Mr. Ono has to understand that the United States in its southern area is very warm, in many parts over 100 degrees for the entire summer. Most of these accidents have occurred in that part of the country. By not relating the obvious similarities between Saudi Arabia and the United States, you give our consumers the impression that you don't care about their safety even though the conditions are very similar to those in Saudi Arabia.

Mr. ONO. That is not the case because we give first priority to safety.

Mr. CRIGGER. If I could add a couple of points, I think it would be helpful here. The committee does have a copy of the Middle East tire survey that was done at the time to review the Saudi Arabian situation. There were two things. One, the tire that was being discussed, and that was a 16-inch tire, and all of our data that we have about the performance of the 16-inch tire in the United States says it is fine, it meets all parameters that we want for safety and for quality. So we didn't have any indication that there was a problem.

What we did do, along with Ford, a test in Southwest where we pulled off tires in hot climates and checked those tires, and we found no problems with those tires. So the follow-up with that found that there was not an issue.

Mr. MARKEY. The problem you have here, Mr. Crigger, is that the kinds of conditions that Mr. Ono is citing as the reason why you would not share that information with the American consumer is that—is that the conditions are different when in fact the conditions are identical. So for us it appears that Firestone was hiding information from the American consumer that was directly relevant to the safety of their families in vehicles using Firestone tires.

Mr. TAUZIN. The gentleman's time has expired. Mr. Ono may respond if he would like to.

Mr. Ono, would you like to respond to the gentleman's statement?

Mr. ONO. It is not that we are hiding information. We have conducted this research with Ford, and we have shared our data with Ford. Certainly in addition to being hot, it was the severely underinflated tires driven at high speeds, and I would say these were the major factors, and I am referring to Saudi Arabia.

Mr. TAUZIN. The gentleman from Michigan, Mr. Upton, is recognized, the chairman of the Oversight Subcommittee.

Mr. UPTON. Thank you, Mr. Chairman. Mr. Crigger and Mr. Wyant, these numbers on the board here, 294 claims in 1997, 384 claims in 1998, 772 claims in 1999, did those numbers actually cross your desk? Did you see that as those years came about?

Mr. CRIGGER. I did not.

Mr. UPTON. Mr. Wyant?

Mr. WYANT. I did not.

Mr. UPTON. Who at Firestone tracks these numbers?

Mr. WYANT. I can't tell, but I believe those are property damage claims, property damage claims.

Mr. UPTON. So in your role you don't see those numbers on even a yearly basis?

Mr. CRIGGER. No, sir, I personally don't see those.

Mr. WYANT. I believe they are reported on an annual basis. But to put it in context, the normal process for our company, and I believe for the tire industry, although there may be some disagreement on that, I believe the standard or norm is the customer warranty adjustment process where it is customer satisfaction driven, and it is not customary to utilize claims because typically the claims are very low and you can't use them to assess product performance or product quality.

Mr. UPTON. I tell you what concerns me. This is a letter that is in the book. I will read it to you. It is brief. This is a letter from John Behr, an account executive at Firestone to Ford Motor Company.

Mr. TAUZIN. Document 17.

Mr. UPTON. Thank you. It is after the Saudi Arabian recall. It is dated March 11, 1999. It just says this. "Obviously that return rate is extremely low and substantiates our belief that this tire performs exceptionally well in the U.S. market."

Now, as I have looked at some of the statistics with regard to the tires that have been a majority of the claims, the tires in question amount to about 10 percent of Firestone's total tire production from 1997 to 1999. Ten percent of the tires. Yet better than 50 percent of all of the tire claims are these tires. Shouldn't that have put Firestone on notice that there were some problems with the tires, particularly when 50 percent of those tires were from the Decatur plant. If that is not a signal that you have a problem with the tires, versus everything else that you produce, how is it that you tell Ford in this letter that the tire performs exceptionally well? That is an A.

Mr. CRIGGER. I believe in this case, sir, you are looking at the tire P25570R16.

Mr. UPTON. Right, for the Explorer.

Mr. CRIGGER. This is the 16-inch tire. This tire performs exceptionally well. The tires that have the safety issue that we have recalled are the P23——

Mr. UPTON. Were these tires not recalled in Saudi Arabia or replaced?

Mr. CRIGGER. The 16-inch tire in Saudi Arabia was replaced by Ford on the basis of customer satisfaction, but not on the basis of defect in the tire. As I mentioned, both companies looked at the performance of the tire, and you have a copy of our report, and the technicians concluded that it was not a tire defect that was involved here.

Mr. UPTON. What do you do with the tires when you know that 50 percent of the tire claims coming from 10 percent of your production have problems?

Mr. CRIGGER. What we——

Mr. UPTON. You have known that for 3 years.

Mr. CRIGGER. Unfortunately, in hindsight you are right. We wish we had looked at claims the way that we now look at claims. Claims have never been a performance indicator. I know now, looking back historically, it is something that we wish we had seen. But we had always looked at the indicators that we would normally use and that the industry uses: The performance testing, the tire warranty information, which is the largest pool of information concerning the performance of a tire, and of course inspection of tires in the field. And all of those indicators indicated all along that these tires were fine. They were performing well. They had good numbers with respect to adjustment and so on.

Only after we got into this in more depth, particularly after we saw the serious injury claims mounting this year, did we begin to collect information of all kinds. And yes, we analyzed along with Ford information associated with claims.

Mr. UPTON. Chairman Nasser in his testimony on the next panel says it has been standard practice in the automobile industry that tires are the only part of the vehicle not warranted by the vehicle manufacturer. They are the only part for which manufacturers do not receive field performance data. At Ford this will change. I presume he is going to add emphasis when he delivers that in his statement.

Are you going to agree with Ford's request? Allow them to receive your field performance data?

Mr. CRIGGER. We are going to cooperate with Ford, yes.

Mr. UPTON. And he is correct that you did not provide that material up to this point?

Mr. WYANT. The claims data has not been used for measurements of tire performance, but adjustment data has.

Mr. UPTON. This says field performance data. I presume this means testing on the track.

Mr. WYANT. They see every bit of the field performance data that is devoted to approving a tire. I believe that is referring to adjustment data which is periodically reviewed. But if they want larger review or total review, I don't think that we would have any problem with doing that.

Mr. UPTON. Have they requested that in the past and you have not delivered?

Mr. WYANT. Only periodically and in special circumstances and I think there was a review, and I might be wrong on memory, on this particular tire, that is the 16-inch Explorer tire that was reviewed with Ford to my knowledge. That was a request to do that and we complied.

Mr. UPTON. I talked with some of the Firestone dealers in my district this morning, and they indicated that all of the tires that they are swapping with customers, all of the tires that they are then retrieving from customers are in fact going back to Firestone. Have you found anything yet from any of the tires that you have taken back from customers?

Mr. WYANT. At this point there are maybe thousands, certainly there are over 500 tires back in Akron when we came here, there may be over a thousand now, and they are being micro analyzed by the Ford people and outside parties, including outside laboratories and specialists, to try to determine the cause because unless we come up with cause, we don't have an answer to the problem. So we must find the cause, and we are doing everything we humanly can to find that. And believe me, there is nobody that wants to find cause more than we do.

Mr. UPTON. There is a shortage of tires to be used as replacement tires, as I have heard from my folks in Michigan. During this shortage, is Firestone allowing other manufacturers' tires to be used as replacement tires?

Mr. CRIGGER. Yes. We have opened it up so that any tire that a consumer can find for their vehicle, they may take that tire as a replacement and then we will reimburse them.

Mr. UPTON. So Goodyear or General, it doesn't matter?

Mr. CRIGGER. That's correct. We have gotten good cooperation from our competitors to increase the supply of tires.

Mr. TAUZIN. The gentleman's time has expired. Go ahead, Mr. Markey.

Mr. MARKEY. On this recall, is Firestone going to reimburse for the labor as well? It was original equipment. In addition to the new tires, will you give the $50 or $75?

Mr. CRIGGER. We are reimbursing up to $100 per tire for consumers who have other product put on the car if they are able to find a competitor tire.

Mr. MARKEY. Does that include the labor to put the tire on?

Mr. CRIGGER. Yes, that accounts for the complete replacement.

Mr. TAUZIN. The gentleman's time has expired. The gentleman from Michigan, the ranking minority member of the full committee, Mr. Dingell, is recognized.

Mr. DINGELL. Thank you, Mr. Chairman. Gentlemen, you have indicated that Ford conducted an analysis of Firestone's claims data. Ford is your largest customer. Ford requested the data on June 8. Firestone did not give it until July 28, 7 weeks later. Can you tell me why?

Mr. WYANT. Ford did request the data in conversation. It was further—subsequently further solidified in a phone call request. And in response to them we requested confidentiality of the data as it was submitted to NHTSA with confidentiality, and my recollection is that it took approximately 4 weeks to get confidentiality agreed to. Ford did submit the data.

Mr. DINGELL. Ford didn't want to give you confidentiality, but you wanted confidentiality?

Mr. WYANT. That's correct.

Mr. DINGELL. As recently as April 28 of this year, just 4 days before NHTSA initiated its investigation, Firestone provided Ford with assurances that its Wilderness and ATX tires were okay. I would refer you to the memo from Mr. Robert O. Martin, Bridgestone/Firestone's Vice President for Corporate Quality Assurance. In that memo, Mr. Martin says Bridgestone/Firestone's Akron Technical Center analyzed 243 tires taken off 63 Ford vehicles and their mileage ranged from 11,320 to 76,092 miles. According to Mr. Martin, he said as follows: Examination of the tires revealed no tire deficiencies and that the tires performed as expected.

That is in addition to the other memo that we have here which says approximately the same thing a year earlier. Can you tell me how Firestone's technical center missed seeing the problem?

Mr. CRIGGER. This was the Southwest test that I referred to earlier. I don't think there was a problem found in these tires. That was the point of the test. It was a follow-up.

Mr. DINGELL. You will note that this is 4 days prior to the time that NHTSA initiated its investigation, a time following a number of things, including the television show which was shown earlier, pointing out major defects in those tires.

Mr. CRIGGER. Well, I think the population of tires is huge. There is 14.4 million tires involved in the population that was recalled.

Mr. DINGELL. You also had complaints during this time and previous to this time about Bridgestone/Firestone tires; had you not?

Mr. CRIGGER. Yes. We had had complaints.

Mr. DINGELL. The Firestone recall affected a number of Ford vehicles. It also affected Mazda, Navaho SUVs and V series pickup trucks. The NHTSA advisory last week also affects the Chevy Blazer SUV and three model years of Nissan pickup trucks. There are a number of different vehicles and a large number of vehicle models that were made by different manufacturers. Doesn't that tell you there must be something wrong with the tires and not with the vehicles?

Mr. CRIGGER. We certainly had our concern about safety issues and the tires, and that is why we recalled the tires that we did. That is a fact.

We are looking now for the root cause. Even though these incidents are horrible and we regret every one and wish we could change it, it nevertheless is a small population that we are trying to identify in terms of root cause.

Mr. DINGELL. You had figures on a large number of tires on different vehicles on different models.

Now, tell me how the plant at Decatur operated during the period of the strike, which began in July 1994 and ended in December 1996. I am told that the replacement workers first entered the plant in January 1995. Now I would ask, first of all, how many of these replacement workers were used for inspectors, quality control and positions like awlers to address the problem of blisters in tires?

Mr. CRIGGER. My understanding is that replacement workers were not used in the quality control inspection.

Mr. DINGELL. Can you make that as a flat statement?

Mr. WYANT. I have been told that as a flat statement.

Mr. DINGELL. You have been told but you do not know it.

Mr. WYANT. I was not there.

Mr. DINGELL. How many were used for inspectors, and how many were used for awlers?

Mr. WYANT. The replacement workers went through the same training processes as everyone else. The last place they wound up was in these critical technical positions, including the laboratories, the final inspection which includes repair or, as you state, awling.

Mr. DINGELL. I am going to ask that the Chair do assist me in procuring further information on that particular point.

Now——

Mr. TAUZIN. Let me do that for the gentleman. Do we have an agreement from Firestone that you will submit the information requested by Mr. Dingell to the committee?

Mr. CRIGGER. Yes. No problem.

[The information referred to follows:]

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January 12, 2001

VIA COURIER

Tom DiLenge
Deputy Chief Counsel for Oversight and
Investigations
House Commerce Committee
2125 Rayburn House Office Bldg
Washington, DC 20515-6115

Dear Tom:

Per your request, on behalf of Bridgestone/Firestone, Inc. ("B/FS"), I am providing the following responses for the record from the September 6, 2000, hearing. This information was provided orally to Congressman Dingell's staff shortly after the hearing, but is now being submitted for the written record.

Congressman Dingell asked for certain information relating to the Decatur, IL, plant, and as you requested, we have summarized this response based on information provided to us by BFS. Let me know if you have questions or need additional information.

First, Congressman Dingell asked about the production numbers for Decatur for the periods before, during, and after the strike. The strike period lasted from July 12, 1994 - May 22, 1995. On May 22, the union offered an unconditional return to work notice, but the actual agreement was not ratified by the union membership until December 12, 1996. Permanent workers began to return to work on or around May 22, 1995. Because BFS has requested confidentiality and the Committee has granted this request, the information is being provided as a separate attachment.

Congressman Dingell also inquired regarding the number of replacement workers during the strike and what kind of duties they performed, specifically whether or not replacement workers were used as inspectors or in quality control positions. The following chart provides the numbers of employees at the plant during the period of the strike, other than managers, supervisors, and salaried workers:

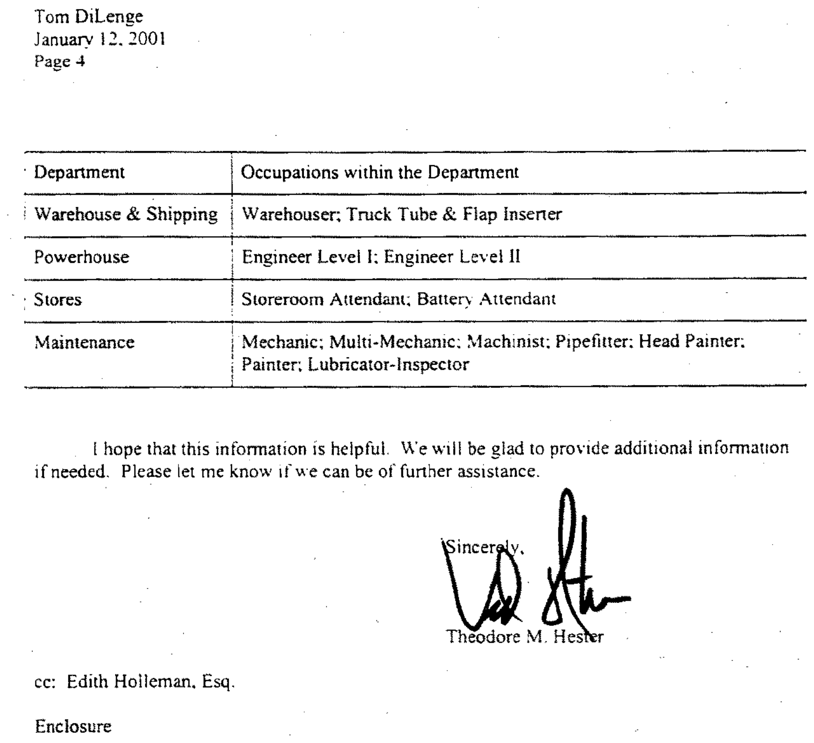
Date	Permanent Workers	Replacement Workers
July, 1994	24	49
August, 1994	24	49
September, 1994	24	49
October, 1994	28	175
November, 1994	45	227
December, 1994	75	308
January, 1995	261	923
February, 1995	308	935
March, 1995	310	952
April, 1995	310	952
May, 1995	371	1,048

BFS advises us that the replacement workers performed a variety of tasks and worked in all departments of the Decatur plant. All replacement employees went through specific job training, just as any permanent worker would. Training consisted of the new employee working with an experienced trainer, initially in a one-on-one basis. The duration of the training was based on the requirements of the job and the skills of the individual. The trainer would monitor the progress of the trainee until certified.

In the case of inspectors, the trainees would receive a formal training program with testing and follow-up. The program consisted of individualized instruction, observation, and a performance review. The review would be evaluated and signed by the instructor, trainee, and foreman. The inspector trainee would also be given a written test to assess the skills learned. Based on the results of the test, the inspector trainee was either certified or received additional training.

As noted above, during this period there were a substantial number of "permanent" workers who crossed the picket line, and the plant continued to be staffed by supervisors and salaried workers. The following chart lists the various departments and the occupations that replacement workers filled.

Department	Occupations within the Department
Compounding & Mixing	Pellet Tower Attendant; Banbury Operator; Utility or Service Worker; Power Trucker; Cement Mixer; Refiner Mill Operator; Refining Trucker; Slab Off Mill Wig-Wag Attendant
Calendering	Calender Operator; Helper; Mill Operator; Creel Room Attendant; Utility or Service Worker; Power Trucker
Stock Cutting	Slitter Operator; Stabilizer Ply Roll Certifier; Automatic Splicer & Hot Insert Cutter Operator; Fischer Cutter Operator; Off-line Innerliner/Sidewall Pre-assembly Operator; Battery Attendant; Bias Cutter Operator; Utility or Service Worker; Power Trucker
Bead Making	Wire Insulator Operator; Bead Assembly Operator; Programmed Wire Winder Operator; Cold Applied Dual Filler Bead Assembly Operator; Bead Filler Extrusion Line Operator; Utility or Service Worker; Power Trucker
Tubing	Dual Tube Machine Operator; Tube Machine Booker/Trucker; Attendant; Helper; Dual Tube Machine Certifier; Triplex CFE Operator; Utility or Service Worker; Power Trucker
Tuber Die Making	Tube Machine
Curing	Curing Press Operator; Bladder Cure and Preparation Worker; Tire Doper and Sorter; Mold Cleaner and Changer; Mold Radial Runout Inspection/Correction Operator; Mold Equipment Inspector; Utility or Service Worker; Power Trucker
Final Finish	Final Finish Equipment Regulator; Tire Balancer; Tire Repairer; Tire Sorter; Tire Classifier and Repairer; Checker and Labeler; Module Operator; Module Loader; Utility or Service Worker; Power Trucker
Waste Control	Workaway Labor; Power Trucker
Receiving	Checker; Utility or Service Worker; Trucker Attendant



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Department	Occupations within the Department
Warehouse & Shipping	Warehouser; Truck Tube & Flap Inserter
Powerhouse	Engineer Level I; Engineer Level II
Stores	Storeroom Attendant; Battery Attendant
Maintenance	Mechanic; Multi-Mechanic; Machinist; Pipefitter; Head Painter; Painter; Lubricator-Inspector

I hope that this information is helpful. We will be glad to provide additional information if needed. Please let me know if we can be of further assistance.

Sincerely,

Theodore M. Hester

cc: Edith Holleman, Esq.

Enclosure

Mr. TAUZIN. Mr. Dingell, proceed.

Mr. DINGELL. Your statement says, and I quote, "Our analysis of the failed tires has shown that failures were caused by external damage, improper maintenance or by operating the tire with pressure significantly below the 26 pound per square inch level recommended for the Explorer by Ford." By significantly below 26 pounds per square inch, do you mean 20 pounds per square inch or below?

Mr. WYANT. Excuse me, Congressman, are you in the Southwest survey?

Mr. DINGELL. That is in your statement.

Mr. WYANT. The Southwest survey had numerous tires in it, in the teens, that is correct.

Mr. DINGELL. Thank you. Mr. Chairman, I have used my time.

Mr. TAUZIN. The Chair is always pleased to follow the gentleman's line of questions and I appreciate them, sir.

The Chair now recognizes Dr. Ganske.

Mr. GANSKE. Thank you, Mr. Chairman, and, Mr. Ono, thank you for coming a long ways to be with us today.

Mr. Ono, do you agree that the tires made at the Decatur plant have a significantly higher failure rate than the same type of tires made at other plants?

Mr. ONO. I believe you can say that based on the claims data.

Mr. GANSKE. Mr. Ono, the tires made at all of the plants were inflated or it was recommended that all of the tires made at all of the different plants, it was recommended that they be inflated at 26 pounds on the Explorer; is that right? Was there any difference in inflation recommendations between the plants of the tires made at the Decatur plant versus any of the other plants?

Mr. ONO. I was not too clear on your question, but I believe our tires are designed to a spec given by Ford of 26 psi.

Mr. GANSKE. And there was no difference between the tires made at the Decatur plant and the other plants in terms of that recommendation?

Mr. ONO. Absolutely none.

Mr. GANSKE. But the tires at the one plant failed more than the tires made at the other plants. So if the inflation pressure, which was the same for the ATX tires from all of the plants, that couldn't be the cause of the difference in the failure rate at the Decatur plant then, couldn't it?

Mr. ONO. Well, that was our thinking as well, and we conducted for approximately 2 months an investigation with the cooperation from Ford and also by getting help from Japan, but we were not able to find a major problem.

Mr. GANSKE. Okay, so we are in agreement. The tire pressure was not a factor because it was the same for all of the ATX tires regardless of which plants that they were produced in. So that gets me back to Mr. Dingell's question. There was a lot of labor strife and striker replacement at the Decatur plant. You had a lot of new workers on the line. Were experienced inspectors replaced during the strike?

Mr. WYANT. Was the question directed at me?

Mr. GANSKE. No, I would like Mr. Ono to answer that if he would, please.

The INTERPRETER. You are asking about inspectors?

Mr. GANSKE. Yes.

Mr. ONO. I believe Bob would be able to respond to you in greater detail.

Mr. WYANT. As I explained with Congressman Dingell, I am not 100 percent certain about the timing because you said by the end of the strike——

Mr. GANSKE. During the strike.

Mr. WYANT. That information or documentation of that will have to be provided.

Mr. GANSKE. All right.

Mr. CRIGGER. I can say that it is my understanding that it was supervisors and salaried quality assurance people that performed that function initially.

Mr. GANSKE. That it was supervisors——

Mr. CRIGGER. And salaried quality assurance people.

Mr. GANSKE. Does the company have any records from the Decatur plant indicating problems with quality control during that time period, Mr. Ono?

Mr. WYANT. May I attempt to answer the question?

Mr. GANSKE. Sure.

Mr. WYANT. We have extreme amounts of process control data. The process begins at the front of the plant, which is raw materials, through every process in the plant out to the warehouse, and the probable cause team or the team to find cause has been through millions and millions of pieces of data trying to find out if there is a measurable quality control item within the plant that would indicate that. At this point we do not have that and that is why we are asking for outside support from independent third party people.

Mr. GANSKE. So your answer is that you don't know at this time?

Mr. WYANT. I do not know at this time.

Mr. GANSKE. Maybe you know this. Were the numbers of defective tires pulled off the line different during the strike than at times other than the strike?

Mr. WYANT. Pulled off the line means for some reason, cause?

Mr. GANSKE. Yes.

Mr. WYANT. Not to my knowledge.

Mr. GANSKE. Do you know that for a fact? Have you looked at that?

Mr. WYANT. I have not looked at that.

Mr. GANSKE. My final question is: Will that data be made available to NHTSA?

Mr. WYANT. Certainly.

Mr. GANSKE. I thank you. I yield back the balance of my time.

Mr. TAUZIN. The Chair is advised that there are three votes now being called on the floor and perhaps it is appropriate now for us to take a break. What we will do is recess until 6:45. That will give everybody a chance to have a good break. The Chair announces a recess until 6:45.

[Brief recess.]

Mr. TAUZIN. The committee will please come back to order. We will ask our guests to take seats and someone to catch the doors. It will take a few minutes to settle down.

Mr. Ono, let me welcome you again, and as we left for the votes, we had completed questions on this side. The Chair now recognizes Mr. Sawyer from Ohio for a round of questions.

Mr. STUPAK. I think I'm next.

Mr. TAUZIN. I'm sorry, Mr. Stupak from Michigan.

Mr. STUPAK. Thank you, Mr. Chairman. Mr. Ono, would you and Bridgestone/Firestone join me today in calling for and cooperating with a blue ribbon, truly independent panel to perform a review on the AT, the ATX and the Wilderness tires to determine the cause and propose solutions? Would you give us that commitment today?

Mr. ONO. Yes, I do commit.

Mr. STUPAK. Thank you. Firestone has maintained that the problem is not tire failure, but yet Goodyear Wranglers on the same vehicles under same conditions do not experience a tread belt separation. How do you explain that these failures are occurring in an abnormally large percentage of Bridgestone/Firestone tires but not Goodyear tires?

Mr. CRIGGER. We recognize that there's a problem. There's no question there's a problem. I don't have any data on the Goodyear performance or Goodyear tires, but when we recognized this problem, that's why we recalled the tires.

Mr. STUPAK. But the problem then has to be in the tire, right?

Mr. CRIGGER. There's something we're looking for in the tire, that's exactly right. We're looking for a root cause in that tire. As I mentioned earlier, the incidents that we have are so serious that they stun us all and they're shocking to us all. And we're looking, though, at a huge population of tires to find out why, what is a relative few are creating such problems.

Mr. STUPAK. When you design and build a tire you take in consideration, do you not, that consumers drive too fast, that they drive underinflated, that they overload their vehicles. That's all in consideration of tires—when you design a tire, don't you?

Mr. CRIGGER. I think Bob probably should.

Mr. STUPAK. Okay. Mr. Wyant.

Mr. WYANT. Certainly a certain amount of that is included and is indicated in tire and rim load inflation tables as an example, but when you're talking about low inflation level, particularly when you get down into the teens or 15 below, no, that is not included in the design standard.

Mr. STUPAK. But in this tire, those factors are taken into consideration, correct?

Mr. WYANT. Those service factors, no, they are not. Tires will not run in those low inflation conditions.

Mr. STUPAK. So when you design a tire, is it your testimony, then, it can only run underneath the specifications you say?

Mr. WYANT. The tire in this particular case specified at 26 psi will run at 26 psi, and if maintained in that range it will perform.

Mr. STUPAK. Then why does Firestone have a separate tire for high-speed driving called the URH-rated tire and why do you have a special service tire that's developed for another part of the world and why do you have an S-rated tire that's more resistant to puncture and other things? All the excuses you're giving why the American consumer is having problems with these tires, you make a special tire for those areas.

Mr. WYANT. You're referring to I believe top-flight types of tires or high-speed tires, tires that are designed for high speeds, meaning 95 and up.

Mr. STUPAK. Well, I'm talking about the URH-rated tire, I'm talking about the off-road tire, and you have a special service tire that you use. I'm talking about a tire that's S-rated. So you can't have it both ways. You can't say if you're going to run at high speeds you've got to have this tire. You can't say that if you're going to run underinflated you've got to have this tire. And you can't say to the American people, if you're going to do all those things, you go and use the tire for a certain part. These tires are built to withstand wear and tear that the American public and Saudi public and Venezuelan and all the rest of them use.

Mr. WYANT. They are designed to perform in an extremely difficult environment, and yes, they are designed to perform in that region. But as example, high-speed—such as in Saudi Arabia and even in Venezuela—tires are not designed to go 40-, 50-, 60,000 miles at 95 miles an hour and up.

Mr. STUPAK. Are you saying, then, the only tires that are allowed are 40-, 60,000 miles tires that are driven at high speed?

Mr. WYANT. I missed the first part, sorry.

Mr. STUPAK. Are you saying, then, that if your tire has 40,000 to 60,000 miles on it, it cannot go at a high speed?

Mr. WYANT. No, I didn't say that. I said if a tire is not designed for that, it cannot do that.

Mr. STUPAK. Well, what are the limitations then on this tire, this 15-inch, this P235/75R15-inch tire? What are the limitations?

Mr. WYANT. With respect to speed?

Mr. STUPAK. Any limitation you place on this tire.

Mr. WYANT. I'll make the case before—there was a discussion about Saudi Arabia.

Mr. STUPAK. No, no. I'm talking about American consumers. I go out and buy my Ford Explorer and they have 235/75R15. What limitations would you place on me, as a consumer with that SUV, with your tires? What limitations would you give me?

Mr. WYANT. Well, the tire is not a speed-rated tire, meaning it's not designed for the 95-mile-per-hour and up under continuous service. It is designed for this market at speeds below that.

Mr. STUPAK. All right. What about off the road, what about low pressure? Do you give me a guide on how many times I have to check my tire, my pressure?

Mr. WYANT. If the tire runs at low speed for limited times at reduced inflation, it can run off the road. The difficulty comes when you then come back on the road; if you do not reinflate, then you're severely overloaded, and particularly if you run high speeds.

Mr. STUPAK. In testimony earlier, I thought, Mr. Ono, that you said that when you were talking about the Venezuela tires, that you used different materials to build that tire, and most of those tires were—the problems in Venezuela were used with different materials. Was that a correct statement?

Mr. ONO. Well, the steel use is different. In America polyethylene is used, while—polyester—correction. In the United States polyester is being used. In Venezuela nylon-embodied poly is used and also compounds used are different.

Mr. STUPAK. But still in Venezuela the tires that had difficulties were American-built ones, plus Venezuela-built tires?

Mr. ONO. It was—they were the Venezuela-built tires that had problems in Venezuela, and as far as the ATX and the ATX II tires, those tires were also recalled in Venezuela.

Mr. STUPAK. I realize they were recalled.

Mr. ONO. Correction—replaced in Venezuela. That is, the tires recalled in the United States, the ATX and the ATX II, were also replaced in Venezuela. I'm talking about 235/75R15.

Mr. TAUZIN. If the gentleman would yield a second, it's my understanding there was a Ford replacement in Venezuela that included Venezuelan-made as well as American-made tires, and that there has subsequently been a Firestone recall with reference to Venezuelan-made tires that has extended the recall in effect. Is that correct?

Mr. CRIGGER. My understanding is that the Firestone action had to do with Venezuelan-produced tires. Venezuelan——

Mr. TAUZIN. The Firestone action. But the Ford action had to do with both Venezuelan- and American-made tires. I yield back to the gentleman.

Mr. STUPAK. Were any of those Venezuelan tires ever imported or exported here to the United States?

Mr. CRIGGER. No.

Mr. STUPAK. Thank you, Mr. Chairman.

Mr. TAUZIN. I thank the gentleman. The time has expired.

The Chair now recognizes the gentleman from Tennessee Mr. Bryant.

Mr. BRYANT. Thank you, Mr. Chairman. Gentlemen, I have a number of questions I do want to ask you, and I might begin with my understanding of your explanation of this chart and the increase in the claims which I understand to be domestic claims, the charts from 1992 to 2000; and for the first 3 or 4 years they're relatively the same, and then there is an incline beginning in 1996.

Is there any explanation you can offer those of us here that are looking at this chart for that dramatic increase over a number of years? Did something happen 1995/1996 that—in regards to this tire, and I understand most of these were tread separation and had to do with SUVs and maybe even the Explorer. Did the Explorer change? I mean, what happened? Do you have any explanation?

Mr. CRIGGER. I wish we knew what happened. We're searching, as Mr. Wyant said, we're searching diligently trying to look for root cause. We really want to identify this root cause. We want it because the American people need it. We need it. We need to understand it, and it's been elusive. The chart that's shown represents I think probably less than two one-hundredths or two-tenths of 1 percent of all of these tires. It's a small population. It's critical, of course, because of the damage that we've seen, but we haven't been able to identify that yet.

Mr. BRYANT. Now you say in terms of quality control—and I guess that's, Mr. Wyant, in your area—that what you used as a measuring stick was not necessarily the claims made but rather the adjustments that you would make under the warranty provisions. And I understand in reading some of the data that's been provided that that standard was within an acceptable margin, parameters—is that correct—during all these years?

Mr. WYANT. That's correct.

Mr. BRYANT. Now, is that consistent, that the adjustments would be within an acceptable standard, yet claims made would be clearly outside?

Mr. WYANT. Let me explain. That chart as an example, as Gary said, is in the recall population from—that is .02 percent. So we're looking for this sort of needle in the haystack. But when the needle in the haystack is there, it's terrible. We know that. We don't know why but we know it's terrible.

That particular chart there has not been used. We have used adjustment data because it is a more precise measure, and within the adjustment population things look normal. In fact, some of these tires look excellent, but still, we have got this needle in the haystack phenomenon that is not good. So based on, in fact, claims data, not understanding the cause, and not really understanding the phenomenon, we took out 14.4 million tires on the basis of safety, even though we did not know the cause.

Mr. TAUZIN. Would the gentleman yield a second? This needs to be clarified. The tires that fail in these claims appear normal until they blow. No one in their right mind would take them in under warranty. They wouldn't show up as a warranty claim, would they not?

Mr. WYANT. It has been our company's practice for many years to provide customer satisfaction. In that population, our tires that in fact have punctures, repairs, et cetera, the population distribution within that I am unsure of.

Mr. TAUZIN. Let me say it a different way. The idea of relying upon warranty claims to decide whether you've got a problem or not doesn't make any sense when it comes to tires that blow apart because they look normal. I have got four of them sitting downstairs in the basement, in the parking lot, under my Ford Explorer. I just went and looked at them this morning, and they all look perfectly normal. But any one of them could blow if I drive at a high speed in hot conditions and low inflation—all these combination of elements. I would never take one of those four tires in for warranty. It would never show up as a problem until it blew and I'm dead.

That's the problem with the statistics we have here and how did—and why did Firestone not understand that as they were calculating and collecting these statistics? I don't understand why you continue to rely upon warranty data to decide you had a problem is my point. I thank the gentleman.

Mr. BRYANT. Mr. Wyant, do you have any comment? I have another question if you don't.

Mr. WYANT. Yes. Obviously at this point, with the circumstance that has occurred, we are looking closely at this type of claim data. Certainly that is true. Normal tread separations have some type of warning to them. In many reports here there is not a warning. There is not a warning with a blowout or a massive puncture, as an example, or a bottoming out on a chuckhole. So there are events for which there is not warning, and in this particular case, there are reported incidents, many, where there's not warning for a tread separation. That is not normal.

Mr. CRIGGER. Because there are normally tread separations in tires; I mean, some level, that occur in all tires. I think you will find that. But of course what's happened here is the incident of the tread separation is greater, that's why we were concerned, and the result has been terrible.

Mr. WYANT. Explain to me why on this particular tire that you, as manufacturer of the tire, recommend that it run at 30 psi on the Explorer, but yet Ford—and I assume in their manual, manual for the Explorer—recommends at 26 psi?

Mr. CRIGGER. Bob, of course, could speak to the technical detail, but from the nontechnical point of view it's simply to add a margin of safety, particularly during this time when we have tires on the road, not yet replaced, which we're trying desperately to get replaced by every means we know.

Mr. BRYANT. Weren't these recommendations in place before this whole situation came to the public?

Mr. CRIGGER. I don't believe they were.

Mr. WYANT. No, they were not.

Mr. BRYANT. They were not?

Mr. WYANT. They were not.

Mr. BRYANT. You were in the room when I asked the—I think it was Dr. Bailey—about the statistic that seemed to be out of kilter in terms of the number of incidents and fatalities with the Explorer as opposed to—with these tires on the Explorer—as opposed to other vehicles, other SUVs with these same tires. Do you have an explanation, any accounting for that?

Mr. WYANT. I believe you're referring to the FARS data; is that correct?

Mr. BRYANT. Yes, I believe so.

Mr. CRIGGER. Well, we know in total that our tires were sourced to the Explorer vehicle and the great majority that were only a couple of years when other tires were sourced to that vehicle. So there is a combination of our tires on that vehicle out there in a great abundance and perhaps more than any other vehicle combination, I don't know. I think it's one of the largest ever for Firestone on one vehicle population.

Mr. WYANT. My hesitation on that response was due to the fact that I believe the FARS data does not typically state the brand or tire. What it states, I believe, is that—an alleged tire-related issue, and when you look at it that way I believe the numbers are something like 5 percent of the FARS population is alleged to be tire related.

Mr. BRYANT. In some of the materials—this will be my last question—that was prepared by the committee for me to review, and I mentioned this to Dr. Bailey and I'm not sure I understood her explanation about the new recall of the, what, 1.4 million tires, and how in the material that was furnished to me by the committee, they indicate there's a number of examples, the so-called population, that there really are only a few; like in some of these tires, there's only maybe one incident or two incidents. But because of the relatively low number of tires out there, it meets their formula, that they have to be recalled. Can you explain that to me? Is she right or is that—is it true?

Mr. WYANT. Let me try to answer that one because I was there.

Mr. BRYANT. I'm sorry. Who's going to try to answer?

Mr. WYANT. I'm going to try to answer because I was there. The original request from NHTSA to expand the recall, our decision was that we could not make a decision at this time and would come back to that issue after these hearings, after these proceedings, when we could look at it with a clearer mind, so to speak.

It was recognized that there were tires in there being requested for recall that had one alleged incident, and that does not appear, even though the rate is higher and we acknowledge the rate would be higher, but the base is low, and one incident will drive the data back and forth. And that is one of the reasons for discomfort with the use of claims data. When the volumes enumerator or denominator are low, it jumps all over the place.

So if you take a number and say that is the level and everything above that is going to be recalled, it is very problematic. I think it's a very problematic issue for the industry.

Having said that, we have cooperated extremely openly with NHTSA and certainly will continue to do that. That issue needs to be resolved. If there's a new bright line based on claims data, I think it needs to be one that is agreed to by NHTSA and by the industry and that it can in fact be done. So our decision at that time is we could not decide at that moment.

Mr. CRIGGER. I think that, just to add, I think that points out why claims data had never been looked at in this way, because the normal circumstance was that there might be one or two claims, and that's a claim, not an actual defect. That's just a claim. What happened differently here is when we looked at these and the numbers and the incidents and put all that together, then we wish, of course, we had looked at claims long ago.

Mr. BRYANT. Thank you, Mr. Chairman.

Mr. TAUZIN. I thank the gentleman. The Chair recognizes the gentleman from Tennessee, Mr. Gordon.

Mr. GORDON. Thank you. Let me first say to our guests, this has been a long day and I appreciate your patience. It's long for all of us.

As I understand it, Ford requires suppliers to use the QS-9000 quality assurance program to control the quality of parts throughout their manufacturing process, including Bridgestone/Firestone, and also that Ford can assure conformity of this QS-9000 procedure, either directly or through a third party. And through the conversations that my staff have had with your office, what has been relayed to me is that both Firestone and Ford feel like that this process was followed properly, that the assurance or the quality program was followed, and that the verification was followed, and you have gone back over this and you still can't find a problem. However, we have a problem or you wouldn't have the recalls. So we sort of have this black hole, this disconnect in between.

Again, my interest is more looking to the future and the lives we can save in the future and the problems we can save rather than trying to point fingers here, and so I would ask that through this long and excruciating review of this control assurance program, what have you discovered? I mean, what do we need to do different in the future? How does this need to be changed? And I would just like whoever to address it.

Mr. WYANT. I'll try to address it. We are a QS-9000 certified company, and it by definition requires pretty high frequency of audits, both externally—in our case it's Lloyds of London—and internally where we have to audit ourself and record, and the key foundation is continuous improvement. In this particular case, in let's say the Decatur plant in, I believe it was September 1997, the plant was certified for QS-9000. I think the data to date shows in fact that the Decatur plant, if you look at 1997 on from adjustment data and in claims data—but I have some uncertainties about claims data—looks very good. So looking at it that way, one could say that the maybe QS-9000 is a causal factor here. QS-9000 encompasses the entire plant from front to back, and that's my comment.

Mr. GORDON. Well, I would also assume that QS-9000 means a continuing improvement of it and trying to do better. So my question to you is, after you have gone back over this a number of times what needs to be improved, what needs to be changed within this quality assurance program both as a supplier as well as a manufacturer in terms of their verification?

Mr. WYANT. Obviously, this is one of the difficulties until we find this cause, this low-frequency event but serious event. Until we find that, I really cannot answer that question. That's why cause is so important.

Mr. GORDON. Well, is this just a Bridgestone problem or is this—and in terms of this QS-9000—or is this an industry problem that needs to be reviewed? I mean, who needs to take the lead in doing what, so that this doesn't happen again? Should Bridgestone clean up their mess and that's it? Should Ford do a better job in trying to—when I say Ford, any of the manufacturers—in verifying? Do you need additional—does NHTSA need to come in and do more?

Mr. WYANT. I think there have been some very good suggestions made including NHTSA, and particularly, the testing process has already begun, including the industry and NHTSA and SAE to see, to try to determine if that is, let's say, the missing link; can it be discovered or uncovered in that process. So I think those are all good moves.

Mr. GORDON. Do we leave this as a consumer—what's going to make me feel better here? Do we leave this up to private industry and yourself to do to a great extent what you did with this earlier QS-9000 and to come up with this procedure, let us know what it's going to be, and then we feel comfortable with that; or does there need to be a greater role for the National Highway Traffic and Safety Administration coming in as a monitor there?

Mr. WYANT. I think we've already agreed that we need to have a joint investigation, if you will, of this, including NHTSA, us outside parties and organizations, like the rubber manufacturer associations, which means the tire industry.

Mr. GORDON. Again, I'm not looking at who's at blame now. How do we get a better process?

Mr. CRIGGER. Well, I think—I was just going to say I think maybe part of what Bob is saying is that the better process is to have all of these agencies and industry looking at what can be done, and we're committed to work with NHTSA, this committee or whoever, to find any improvement that will ensure against this kind of event again.

Mr. GORDON. And so how do we get that process? I mean, do we wait for you to do it or do we need—you know, should it be congressional action? How do we get this process started?

Mr. CRIGGER. I believe some of the process has already begun. I don't know what the next steps would be, but I believe this looking at new ways and new methodologies within NHTSA has already begun.

Mr. GORDON. It would seem to me that if you don't have an answer, then we're going to have to supply the answer. Thank you, Mr. Chairman.

Mr. TAUZIN. The Chair thanks the gentleman. The gentleman from North Carolina, Mr. Burr, is recognized for 5 minutes.

Mr. BURR. Thank you, Mr. Chairman. Mr. Chairman, would it be appropriate if I asked the crowd if there are any representatives here from NHTSA still?

Mr. TAUZIN. Yes, it would certainly be appropriate.

Mr. BURR. Would the record be so kind to show that nobody from NHTSA is here for the remainder——

Mr. TAUZIN. Would the gentleman identify himself.

Mr. WOMACK. I'm John Womack, deputy chief counsel for NHTSA.

Mr. TAUZIN. Deputy chief counsel, John Womack.

Mr. BURR. I appreciate the gentleman for identifying himself and would only make the comment to my colleagues here that I would have hoped that a large amount of the NHTSA team would have stayed, that I think it's valuable to hear the firsthand information from not only these witnesses but Mr. Nasser and Ford, and hopefully it would give them some insight as to some of the challenges they're dealing with.

Mr. TAUZIN. Would the gentleman yield?

Mr. BURR. Yes.

Mr. TAUZIN. I think there are two other NHTSA personnel here. Would you identify yourself for the record?

Mr. YOUNG. My name is Bob Young. I'm defects investigator with the ODI. I'm here for that precise reason.

Mr. BURR. I appreciate that. I would encourage you not to be as reluctant to identify yourself next time somebody asks for——

Mr. TAUZIN. And there's an additional NHTSA personnel, I think.

Ms. DRONEBURG. Hi, my name is Terri Droneburg.

Mr. TAUZIN. She didn't hear that. She was the investigator on the Firestone case. Please supply your name to the clerk.

Mr. BURR. I'm only sorry after hearing that, Mr. Chairman, that she wasn't on the panel with Ms. Bailey to testify, since she was intricately involved.

Mr. TAUZIN. Mr. Burr, if you would yield for a second, too. Let me compliment Mr. Nasser. He's been sitting here all day and I appreciate that, sir. I think it's not only good that you came but good that you stayed and heard these other witnesses. I appreciate that. Mr. Burr.

Mr. BURR. I thank the chairman for his indulgence and let me once again thank Mr. Ono for his attendance and the distance he's traveled. Although my questions won't be directed at him, it's not because I don't want him to contribute to any answers if he feels so moved, but I will address them to his colleagues, Mr. Crigger and Mr. Wyant.

Let me ask both of you, were you briefed by your legal counsel prior to this testimony, and if so, were there areas that your legal counsel told you to stay away from or not answer?

Mr. CRIGGER. No, sir.

Mr. WYANT. No.

Mr. BURR. Were you briefed?

Mr. WYANT. We were certainly briefed, but there's no area that's off limits.

Mr. BURR. Let me ask you, there was a settlement—I say that for the lack of the correct understanding—with at least State Farm, possibly other insurance companies, on issues that they felt were Firestone's responsibility because they were exposed for damages that they felt were the result of the defect in tires. Firestone settled those; am I correct?

Mr. WYANT. Yes, that's correct.

Mr. BURR. Was Firestone the only insurance company that that type of thing happened?

Mr. WYANT. I wouldn't think so. State Farm is the largest vehicle insurer in the country. I believe they have over 20 percent of the markets.

Mr. BURR. Was part of the agreement with State Farm that you would not have to admit to a tire defect?

Mr. WYANT. I don't know anything about that, sir.

Mr. CRIGGER. I'm not aware of the question.

Mr. BURR. I mean, you two are apparently intricately involved in finding a solution to the current problem that you have, and the reason that I ask both of you the question is that I would hope that also the Firestone information would have—or, excuse me, the State Farm information would have been shared with two people who are intricately involved in finding a solution to a tire problem. Did you have something else?

Mr. CRIGGER. Well, I was going to say I'm informed there was no settlement with State Farm, that individual lawsuits have been settled.

Mr. BURR. There was, though, some type of, was there not a—okay. I'll take your legal counsel's shaking of his head as there was no type of reimbursement made to State Farm, but clearly, there were for the cases that State Farm had insured.

Mr. CRIGGER. There where cases that were handled by State Farm, that's correct.

Mr. BURR. Which again I would stress, that if you two are intricately involved in the solution, as I would expect NHTSA to be intricately involved in the information that's out there, that both of you ignored very pertinent information, or somebody in your companies, as it related to what State Farm and, in NHTSA's case, one particular claims adjuster had in fact identified.

Let me move on to specifically the Middle East and to Saudi. In Saudi Arabia——

Mr. TAUZIN. Would the gentleman hold for a second?

Mr. BURR. Be happy to.

Mr. TAUZIN. We have being distributed a document—what's the number of it, 75—which relates to the claims or subrogation claims that were settled for losses for the year 1995, 1997, 1998 and 1999.

Mr. BURR. I thank the chairman.

Mr. TAUZIN. And would note that for the record. I thank the gentleman.

Mr. BURR. Do either one of you suggest that there's not a defect in at least some of these tires?

Mr. CRIGGER. No, I certainly wouldn't say that. There's clearly something wrong. There's something to be found here. This is not normal.

Mr. BURR. Do you also agree that there must be a defect in some of the tires you had in Saudi?

Mr. CRIGGER. That was not the finding in the case of Saudi.

Mr. BURR. And what was the suggested pressure of the tires in Saudi based upon Firestone specs?

Mr. WYANT. That would be a Ford Motor Company spec. I'm not certain what it was. I believe it was 28 or 30, but I think they should answer that.

Mr. BURR. Well, I have certainly gone through your field survey, the Saudi field survey, and tried to determine it. And the reference point used for 54 percent were over 30. I interpreted that meaning 30 was the benchmark.

Mr. CRIGGER. I think 30 was the pressure in Saudi.

Mr. BURR. Is there a reason it was 30 there but that you agreed to 26 here?

Mr. CRIGGER. Again, I'm not the technical person, but I believe in the case of Saudi Arabia we're talking about a larger tire, a 16-inch tire, and in the case of the recall tire we're talking about a 15-inch tire.

Mr. BURR. In one of the instances in Saudi, a Firestone representative sent a letter to a dealer who had been persistent about the problem that he saw in more than one case. Let me read you the response that went back. This would be on tab 15, if you're interested. The response that went back is: Entire pressure should be checked every 2 weeks at least and before every long distance drive. I'm sure you will agree that it cannot be guaranteed that the tire was used at a proper tire pressure throughout its life.

Does Firestone still stand by that statement from a Firestone representative that not only the customer is responsible but that even though you can't guarantee that the customer does it, that you have no obligation, no exposure?

Mr. CRIGGER. I'm sorry, sir, I missed the last part of your——

Mr. BURR. In this particular case the Firestone response was the customer should be checking the tire pressure every 2 weeks and before long distance drives, and we—it says: I am sure you will agree that it cannot be guaranteed that the tire was used at the proper tire pressure throughout its life.

In other words, there may have been a time when the tire pressure went up or down from what we suggested, and that's the fault of the consumer.

Mr. TAUZIN. For the record, again we are talking about document 15.

Mr. BURR. And I think that that response from Firestone is from Keshav Das, K-E-S-H-A-V, last name D-A-S.

Now, let me ask you, what does the manual say, because I think I've heard both of you quote that customers are supposed to check their tire pressure every month. Is that not correct? Did I not hear one of you or both of you state that earlier?

Mr. WYANT. I don't believe we stated that but that would be considered a normal practice, yes.

Mr. BURR. Then why would a Firestone representative put in a letter that it's the customer's responsibility for them to check it every 2 weeks and before a long distance drive?

Mr. WYANT. I think there are, even in this country, advisories to check your inflation or adjust your inflation when you change the load or if you're going to high load in long distance travel. I think that's considered normal, and that may have been considered in this 2-week response, particularly in Saudi where there is significant deflation/reflation issues because of going off road in the sand.

Mr. BURR. I could ask a number of other questions and I'm not going to for the sake of time and because I think I would go over ground already plowed. But let me just make an observation on my part. I hope that Firestone understands the frustration that I think all members on this committee share because we read statements like this that clearly lead us to believe that Firestone was attempting to push aside a potential problem, and pretty soon the problem just got so big that a response to a dealer or a settlement on a subordinate claim wasn't enough.

Now, I'm not sure whether it was Houston TV or whether it was Ford Motor Company or whether it was NHTSA, it's sort of irrelevant. We've got to solve this problem and I wish I could agree with you. I mean, I would like to have you stand up and say, you know, what we put in that letter was a bunch of crap, that was not a sufficient response to our dealer, for our customer. We should have been more concerned, we should have had our eyes open.

But that's not the impression that we get when we read document after document after document where we're debating who was supposed to check the tires, how often were they supposed to check them, and whether in fact Firestone has any responsibility in it. My hope is that you will find that defect and that you will find it quickly and that we will know the scope of the problem.

I thank the chairman for his indulgence and I yield back.

Mr. TAUZIN. I thank the gentleman. If he's looking for a real good case in the documents, look at document 80. Mr. Kenneth Bondi, who was told by the Firestone company that his treads were worn and that was the problem. And he responded, Well, that's neat, but I didn't send you the treads, they're lying on the highway; I sent you the tire without the treads. How do you know they were worn? And Firestone paid him. It's an interesting document. Read it. The Chair recognizes the gentleman from Ohio, Mr. Sawyer.

Mr. SAWYER. Thank you very much, Mr. Chairman. I think if there's anything that the committee has learned this afternoon and this evening is that the issues that we're dealing with here today are enormously complex, the stakes are high, and that we're all searching for an answer.

Let me ask you this. I have got a series of relatively quick questions, I hope. Is it fair to say that a tire is a complex instrument, that the actual compounds, the sourcing of materials, the manufacturing process, the design of the tire and the ambient conditions at specific manufacturing locations could have an effect on the performance of the tire in a way that could contribute to the kind of phenomenon that we're discussing here today?

Mr. WYANT. That is correct. The one thing I would like to make clear, that I don't believe it has been made clear, but one of the reasons the inflation issue continues to come up, as it would with any tire manufacturer, is that it is the most essential part of the performance of a tire. Without sufficient air pressure you will get a tread separation, and that is a normal event when you have that condition. It is normally exhibited by shoulder wear, as you pointed out, and it is evidence of a separation inside of the tire because that's what tires do.

Mr. BURR. Would my friend from Ohio yield 1 second?

Mr. SAWYER. Can I get my time back?

Mr. BURR. If the chairman will indulge you. Let me just make this point, Mr. Wyant. I don't believe that the habits of Americans as it relates to checking their tire pressure has changed significantly in this decade, and the belief that a reduction in tire pressure has caused this aberration because everybody's running them at a lower rate is just not believable. If it was the case because of the habits of most Americans, there would be more than your tires blowing up on the road. I am even guilty of running my tires at less than the recommended rate because I don't check them as frequently, and I think I know more than average in America.

Mr. CRIGGER. I agree with you on that. That's true and I don't think we're trying to say that there's some change in the habits of people that have caused underinflated tires to be the reason for this phenomena. What I think—we're just saying that normal, under normal conditions, you would expect to see tread failures associated with underinflated or other phenomena, improper repair, punctures and so forth.

Clearly what we have here is a problem. There's no question about that, and we're looking for the solution. What is the root cause of that problem? But there's a level, there's a level of masking that had existed because there is a—in a sense, a normalcy because of the outside impacts and influences on the tire that got lost here, and now we have found the problem and we're trying to identify it.

Mr. TAUZIN. The gentleman from Ohio has the time.

Mr. BURR. I thank my friend from Ohio.

Mr. SAWYER. Thank you, Mr. Chairman. My point was that it seems to me there's clearly a complexity of cause involved in all of this and that it could be any of these variables or it could be a combination of these variables working together. Am I correct in that assumption?

Mr. CRIGGER. [Nodding in the affirmative.]

Mr. SAWYER. In the course of the life of a tire design, does a tire remain stagnant—is the design and the manufacturing of that tire consistent over the life of a model or does that—does that model migrate, does it evolve in its design?

Mr. WYANT. The normal practice as I described before, it's under a QS-9000, there are continuous changes or continuous upgrades in processes, in designs and in manufacturing; that is correct.

Mr. SAWYER. Is it possible that that abrupt change could be the product of one or more of these design variables in the productive life of that design?

Mr. WYANT. It certainly could. Unfortunately, we do not have that narrowed down.

Mr. SAWYER. You don't have it narrowed down yet, but that's the sort of thing I assume that you're looking for.

Mr. WYANT. That's correct.

Mr. SAWYER. In the course of all of this do you continuously test the tire according to NHTSA standards for the changes that are taking place or does this take—how frequently do those tests take place?

Mr. WYANT. We have rather frequent high speed and endurance checks in production, and there's a whole schedule for doing that, and it depends on how frequently and the volume of production; but these checks are made as an ongoing matter of business.

Mr. SAWYER. These tests were initially put in place, am I correct, in 1968?

Mr. WYANT. That's correct, on the DOT.

Mr. SAWYER. And they were design ed for tires that were largely bias belt tires as the state-of-the-art as it existed 32 years ago.

Mr. WYANT. That's correct.

Mr. SAWYER. Would it be your suggestion that one of the elements that we need to undertake as we look at all of this is to look at the testing protocols, their appropriateness to the product and their appropriateness to the application to which they're going to be put in the real world?

Mr. WYANT. We certainly agree with that and we would cooperate with NHTSA and the industry to accomplish that goal.

Mr. SAWYER. Let me just close with this, Mr. Chairman. You may recall that in July we had a hearing where Secretary Slater and Secretary Richardson were here with regard to the matter of fuel consumption. On that occasion, I said let me mention one way that we can make a difference in our fuel consumption that's enormously important. The appropriate inflation level of tires makes a huge difference in fuel consumption, and simply checking your tires once a month not only decreases fuel consumption dramatically but it increases the life of the tire.

It seems to me that that kind of continuous education is an enormously important part of what we do here today, what tire manufacturers and tire dealers ought to do on a continuing basis and what government agencies ought to do if we're going to promote the responsible use of products like tires that we place our lives on. Thank you, Mr. Chairman.

Mr. TAUZIN. I thank the gentleman. The Chair recognizes the gentleman from California, Mr. Rogan.

Mr. ROGAN. Thank you, Mr. Chairman. Gentlemen, thank you for your patience here today. I would like to go over briefly my notes respecting the chronology of the Firestone tire sales overseas during this period. I want to make sure I have it right. If I misstate something, please feel free to correct me.

With respect to the Firestone tires that were sold in the Middle East, it was 1997 when the first complaints on the performance of the 16-inch Firestone tire were reaching your office; is that correct?

Mr. WYANT. I'm aware of a tire coming in to the Akron Tech Center. I'm not certain if it was 1997 or 1998, but there was a tire.

Mr. ROGAN. Would it be fair to say that some time at or about 1997, a number of complaints at some point started coming in about the Firestone tire performance in the Middle East?

Mr. WYANT. That's fair.

Mr. ROGAN. And essentially, you checked those on a case-by-case basis and found that all of the problems emanated from some sort of customer abuse, but not from tire defect?

Mr. WYANT. That's correct.

Mr. ROGAN. And at some point Ford Motor Company decided to simply recall all of those 16-inch tires that had been sold on Ford vehicles in the Middle East?

Mr. WYANT. Correct.

Mr. ROGAN. Was that a unilateral decision by Ford or did Firestone participate and agree to that?

Mr. WYANT. We did not participate in that.

Mr. ROGAN. Then at some point Firestone learned that there were similar problems with tires being used in Venezuela, Malaysia and Thailand on both the 15-inch and the 16-inch tires, correct?

Mr. WYANT. Venezuela is correct. I'm fuzzy and uncertain about the Malaysia, Thailand.

Mr. ROGAN. Do any of the other witnesses——

Mr. CRIGGER. I'm not aware of those other countries, but I know in the case of Venezuela, we were talking about Venezuelan-produced product.

Mr. ROGAN. And that was on the 15-inch and 16-inch tire?

Mr. CRIGGER. I believe that's correct.

Mr. ROGAN. When you say a Venezuelan-produced product, is there any kind of product oversight that is done on foreign companies that Firestone owns to make sure that they are at least producing the tire to standard?

Mr. WYANT. They fall under QS or corporate QA types of processes and procedures, as do all of our plants, but they have local market conditions.

Mr. ROGAN. But is there a reason why you differentiate and say a "Venezuelan-produced" tire—is there anything about it being produced in Venezuela that makes it somehow less reliable than, say, a domestically produced Firestone tire made here in the United States?

Mr. WYANT. The Venezuelan issue is one of mislabeling of tires, and there's a significant number of tires in the market that are mislabeled that are being recalled as a customer satisfaction issue and replaced.

Mr. ROGAN. My question is, from Firestone's perspective, do you maintain certain safeguards and quality control over all of your products that are manufactured, whether they're manufactured offshore or here in the United States?

Mr. WYANT. That's correct.

Mr. ROGAN. And that would also apply to Venezuela?

Mr. WYANT. Correct.

Mr. ROGAN. So was there anything about the fact that Firestone tires were manufactured in Venezuela that, in and of itself, would cause anyone to have any concern about quality of manufacture?

Mr. WYANT. Those were the tires that were mislabeled.

Mr. ROGAN. But not, not mislabeled to where the quality of the manufacturer was concerned?

Mr. WYANT. That's correct.

Mr. ROGAN. And those tires were also recalled by Ford in a unilateral action?

Mr. WYANT. Yes .

Mr. CRIGGER. Supplemented now by our own action earlier this week after working with Indecka, the agency there.

Mr. ROGAN. When you received these reports from the Middle East, and at least from Venezuela and from apparently some other offshore jurisdictions, did that give cause for concern to Firestone that there may be a design defect or a product defect in the domestically produced Firestone 15- and 16-inch tires?

Mr. CRIGGER. As we discussed earlier, in the case of Saudi Arabia, which is the one I know from discussion the most about, the answer was no, because the team of engineers that went and investigated tires there, including both Ford and Firestone engineers, did not find a tire defect at the root of the problem in Saudi Arabia.

Mr. ROGAN. The reason I asked the question is that when I looked at the documents it appeared that Firestone was satisfied that this was a unique circumstance in the way the tires were being used in Saudi Arabia or the Middle East that didn't apply here domestically, and so there was no cause for concern.

Mr. WYANT. That's correct. Both Bridgestone/Firestone and Ford Motor Company had joint surveys in Saudi Arabia, and as a result of that, there was a joint survey in the southwest part of the United States to confirm that the tires in this market were okay.

Mr. ROGAN. Mr. Chairman, may I ask the committee's indulgence for 1 additional minute?

Mr. TAUZIN. Would the gentleman repeat his request?

Mr. ROGAN. If the committee would indulge me with 1 additional minute.

Mr. TAUZIN. Is there any objection?

Mr. ROGAN. I just see that the red light is on, and I don't want to impose on the committee's time.

Mr. TAUZIN. I think the gentleman has—we show you having 35 more seconds. Proceed, sir.

Mr. ROGAN. Then can I have a minute and 35 seconds?

Mr. TAUZIN. Is there any objection? Without objection, the gentleman's time is extended.

Mr. ROGAN. I thank the chairman and my colleagues. The reason I asked the question, gentlemen, is that it at least appears to me that the concern was not limited to these overseas tires; both Ford and Firestone undertook additional tests on these tires in the United States in 1999 and 2000. And so if you were simply satisfied that this was a condition peculiar to Saudi Arabia, there wouldn't be a need for an additional 2 years of testing, and that's where I'm seeking the clarification.

Mr. WYANT. The action in the United States was to confirm that they indeed were okay. All of our data shows that there is no problem on those tires in the United States.

Mr. ROGAN. But when did you get back the report that said that the condition is peculiar to Saudi driving conditions? That wasn't as late as middle of 2000, was it? It didn't take 2 years to get that report generated to you, 2 to 3 years?

Mr. WYANT. No, I'm on memory here again. I think it was middle-ish of 1999 from the Saudi survey, somewhere in there, maybe earlier.

Mr. ROGAN. But Firestone continued conducting tests even up to 2000 but never notified NHTSA of any of these concerns?

Mr. WYANT. I'm not sure what tests you're referring to that we continued. We did a joint survey to evaluate the product. That's correct.

Mr. ROGAN. And that went all the way into 2000 and still up until 2000?

Mr. WYANT. I'm not sure exactly when that was.

Mr. TAUZIN. The gentleman's time has expired but the gentleman may respond.

Mr. WYANT. It's correct.

Mr. TAUZIN. That's correct.

Mr. ROGAN. Is it July 7, 1999? Does that date ring a bell?

Mr. WYANT. No. On what part, sir?

Mr. ROGAN. On the survey that came back.

Mr. WYANT. No.

Mr. TAUZIN. The Chair will allow a response and we've got to move on, Jim. Please respond to Mr. Rogan's question and we will move on to Mr. Green.

Mr. CRIGGER. That's correct; July 7 for the Middle East tire survey.

Mr. TAUZIN. The Chair recognizes the gentleman from Texas, Mr. Green.

Mr. GREEN. Thank you, Mr. Chairman. And like everyone else, it has been a long day, not only for ourselves but for our panel and even the next panel. Let me talk about the particular interest I have, because—and I appreciate my colleague from California, because coming from Texas we're now looking at the Department of Transportation complaints summary. It seems like 75 percent of the failures come from Texas, and maybe it's because this last 2 months we've had, you know, 100 degree temperatures every day. It was 105 in Houston, maybe not as bad as Saudi Arabia, but pretty close; or maybe it's because in Texas we do drive a lot of SUVs and use a lot of tires.

What is the average warranty on an ATX? Is it 50-, 60,000 miles?

Mr. WYANT. I don't believe there is a mileage warranty on that tire.

Mr. GREEN. It seems like when I go buy a tire and my constituents do, they have a warranty of the more you pay, the better your warranty, 40-, 50-, 60,000 or some even 70-, I think. Is there any kind of—Firestone's bound to sell a warranty or guarantee a tire for a certain number of miles?

Mr. WYANT. You are correct. Certain levels of tires, and generally there are price positions that cover different types and levels of warranty.

Mr. GREEN. I am looking at the complaints, and it shows mostly ATXs. Does anybody have an idea what the typical—would it be 40,000, 50,000, 60,000?

Mr. WYANT. It would tend to be at the higher end.

Mr. GREEN. So 60,000 wouldn't be out of sight?

Mr. CRIGGER. I don't think there is a particular mileage warranty that was associated with this particular tire, I mean as a stated mileage warranty.

Mr. GREEN. Okay. That is surprising. Because, having bought tires for many years, typically you do have some type of warranty.

Mr. CRIGGER. I think this would come sort of under the standard warranty, which would be we would adjust up to 6 years, I believe, depending upon——

Mr. GREEN. Well, that gets into my next question. You had lots of questions on what Firestone is doing to correct the problem. Obviously, a lot of our constituents, particularly mine in Houston, Texas, may have tires that are the ATX that may need to come in; and we understand from earlier testimony there is a waiting list. I would like to hear some of the questions about how Firestone is compensating some of these customers for these recalled tires. It is my understanding there is an offer of a $100 rebate per tire?

Mr. CRIGGER. That is correct.

Mr. GREEN. I happened to purchase a Bridgestone yesterday because of a tire mishap, and it was $116, and that wasn't bad because it wasn't the size tire that we are talking about, but it was for an SUV, and I am interested in how this offer compares to what the average ATX tire would be. Is an ATX tire about $100 or $120, in the Texas market, for example?

Mr. CRIGGER. I don't know that answer specifically, but my understanding is that the $100 should be able to cover ordinary tire replacement, including the labor.

Mr. GREEN. Okay. And are you prorating it for tire wear? For example, if I had four ATXs on my Explorer and I drove it for 25,000, is that $100 going to be covering all four, each tire, or is there going to be an adjustment based on the wear?

Mr. CRIGGER. No, there is no adjustment for wear. We are replacing the tires, regardless of wear or age.

Mr. GREEN. Okay. Some of the impression I received from your testimony and also the concern I have—and I think my colleague from Ohio realizes how important it is that we as tire consumers check our tires. In your testimony, you said tread belt separations are usually caused by damage to the tires—improper repairs, overload, underinflation or simply by using tires with excessive wear. That statement is in no way trying to transfer the responsibility to the user from the production?

Mr. CRIGGER. No, sir. We know we have a problem here, and we are trying to find it. That is simply the standard condition that we are talking about tires. When——

Mr. WYANT. One comment on that. Again, the shoulder wear issue does happen in service, and it is very—it is not infrequent to see belts that are worn off and exposed and the tire is brought in for an adjustment, and certainly that is a tread separation, but that is what happens out there.

Mr. GREEN. In using SUVs for many years, like I said, I don't get to hunt and fish near as much as I would like, but you typically do lower your air pressure when you are off road, but you fill it—you put more in it when you are driving like everyday city driving or over the road. So I think most people who have those understand that, that if you—so, hopefully, they do remember, because if they don't remember to take it out, they will probably get stuck somewhere.

The other thing, when someone brings their ATXs in with the $100 rebate, are they required to buy other Firestone tires, or can they buy Bridgestone or some other tire?

Mr. CRIGGER. No, any tire. They can go have their tires replaced with our tire, a competitor tire, wherever, and then they come in to turn in the tires, because we have to account for them under the recall, and then they get a refund for them.

Mr. GREEN. Okay. Thank you, Mr. Chairman. I appreciate the time.

Mr. TAUZIN. The Chair thanks the gentleman.

The Chair recognizes the gentlewoman from New Mexico, Mrs. Wilson.

Mrs. WILSON. Thank you, Mr. Chairman.

In a letter to the New Mexico Attorney General, Glen Hass from Bridgestone explains that you abandoned your phased recall, but you do say—he does say that “the shortage of replacement tires at this point requires prioritization of those tires which are available in order to maximize overall public safety. We are attempting to address that issue generally by directing greater numbers of tires proportionally to those areas where we have experienced the greatest number of incidents.”

Why isn’t New Mexico on the list?

Mr. CRIGGER. My understanding is that all of the hot States are trying to be satisfied in their needs. We are trying to satisfy all of the requirement everywhere.

As you mentioned in the letter, we quickly abandoned the phased recall idea. The phased recall idea was never meant to be, although there was a misunderstanding that State 1 would be handled first, and then only after it was handled would State 2 be handled and so on. But we are trying to go where there is the greatest need. We are doing everything we can to get tires to all of the States; and, as we have just discussed, we have opened it up so that any competitor tire available anywhere that a consumer can find for a replacement is eligible for the replacement, as long as it is within the parameters of the vehicle.

Mrs. WILSON. Let me ask that again. You have given a list of where your highest priority States are based on your analysis of the incidents. Why isn’t New Mexico on the list?

Mr. WYANT. At the time of the creation of that list, I believe New Mexico was right at the cutoff of phase 2 when it was originally described. It just went in sequence, and it was just a cutoff based on where does it begin to level out. Now, that may be slightly different now, but that is——

Mrs. WILSON. That was just based on numbers of incidents, is that correct?

Mr. WYANT. That is correct.

Mrs. WILSON. Not numbers of incidents per capita, right?

Mr. WYANT. Right.

Mrs. WILSON. How many people are there in the State of California—Jim, can you help me?

Mr. ROGAN. Thirty-four million.

Mrs. WILSON. Thirty-four million in California, 1.6 million people in New Mexico. Ten percent of your fatalities are in the State of New Mexico, and you didn’t bother to figure out that per capita might make a difference?

Mr. CRIGGER. Clearly, that was a mistake. Clearly, we have abandoned that kind of a program; and we are trying to satisfy everyone’s needs as quickly as we can. We didn’t wait to make the recall. As soon as we understood what was happening, we took the tires back. We didn’t know why, but we took the tires back.

We couldn’t, of course, have an inventory of that many tires; and we couldn’t—the industry couldn’t supply that many tires. So we have made some mistakes along the way, there is no question. But we didn’t make a plan—we didn’t have a plan that was all worked out. We simply reacted as quickly as we could, and we have been changing and modifying as we have gone along to try and make it better for consumers wherever we can.

Mrs. WILSON. You know, it would be nice—you are saying here tonight that clearly you have made mistakes. Boy, that is real clear now. But it would have been real nice if you had been willing to acknowledge that in 1997 when you began gathering data that said that over 2,500 tires were separating. It would have been even better if, when the Attorney General wrote to you from the State of New Mexico, that you would have acknowledged that in the letter that you sent back to her and said, yep, whoops, you are right, let's fix it.

Let's talk a little bit about that data. You have said, said publicly many times and said here again today, that you are working around the clock to find the root cause. When did Firestone start working round the clock to find the root cause?

Mr. WYANT. That was about the same time or slightly prior to the decision process in early August.

Mrs. WILSON. So you started working round the clock in August of 2000, is that correct?

Mr. WYANT. That is correct.

Mrs. WILSON. What were you doing while you were gathering this data and running your tests and going out to Phoenix and Tucson and trying to figure out whether you had a problem?

Mr. CRIGGER. Well, we are always monitoring field performance, as I mentioned before. And, believe me, this is extremely regrettable as we look back in hindsight. But the type of claim data that we are talking about there was not used as a measure of performance indication.

Mrs. WILSON. What was this data used for?

Mr. CRIGGER. It was a summary of the number of claims, and I believe it was used in an accounting sense.

Mrs. WILSON. To determine your profit and loss and liability, wasn't it?

Mr. CRIGGER. It was a summary of the liability, that is correct, but it was not an indicator——

Mrs. WILSON. So you looked at it from a financial point of view but not a consumer safety point of view?

Mr. CRIGGER. I am sorry to say that I believe that is the case. Obviously, that is different today. But the information that we were looking at—in-plant testing, field testing, warranty data—all of the information that was—that we relied on for quality and assurance that the tires were good all looked right. It all looked good.

Now, what we have seen different here—and you are right. When you look back at this you see that this is a different phenomena. This is a population of tires that is so big that the claims data have validity, and we never had a population of tires like that before. Now, of course, we have seen it; and we acted on it as soon as we saw it. I wish we could have seen it sooner.

Mrs. WILSON. I guess I would just end by saying this: I am a pro-business Republican. I am married to an insurance defense attorney. We talk a lot about liability in our house and about tort reform, and I usually lose a little credibility with every audience when I admit that I am married to a lawyer. Despite that, he is a nice guy. But it seems to me I am looking at a company that pays attention to claims data as it affects profit and loss and liability, and you have lost your way. It is about time you fired your lawyers and started listening to your hearts and protecting the people of this country. And when you do that, you will recover your reputation as a great American company.

Thank you, Mr. Chairman.

Mr. TAUZIN. I thank the gentlewoman. As a recovering lawyer, I want to applaud your statement.

The Chair recognizes the gentleman from Minnesota, Mr. Luther.

Mr. LUTHER. Thank you, Mr. Chairman.

I want to follow up a little bit on the testimony about claims. As I understand what you are saying is that you have always looked at warranty data rather than claims data in judging performance or making a decision on a recall. Is that what I hear you saying?

Mr. CRIGGER. That is correct.

Mr. LUTHER. When did you change your policy and begin starting to look at claims data?

Mr. CRIGGER. My understanding is that when we were working in the preliminary evaluation, gathering data, supplying data to NHTSA, that this kind of data came into play, we started looking at it, collecting it. I also understand that it wasn't captured in all of the easy electronic ways that some of the other data was, and so it had to be compiled, but that is——

Mr. LUTHER. So, really, it is within the last month?

Mr. CRIGGER. It was very close to the time in which we made the recall determination, that is correct. Not that we hadn't looked at this data. That is the problem here, is that we had looked at it and we had never looked at it in conjunction with performance of tires.

Mr. LUTHER. Well, I guess where that would take me is how many claims do you have today?

Mr. CRIGGER. I don't know the answer to that. I am advised that, associated with the original population of the preliminary evaluation, it was about 2,400 claims.

Mr. LUTHER. Okay. And over what period of time? In other words, when did they start? What percentage are in litigation?

Mr. CRIGGER. Over a period of 10 years, and less than 10 percent of them are litigated.

Mr. LUTHER. And I assume expert opinions have been rendered in those cases? Experts have been hired by the adverse parties and opinions have been rendered?

Mr. CRIGGER. Yes.

Mr. LUTHER. Would that span the entire 10 years then?

Mr. CRIGGER. During that time, yes. That is one of the things that, because the numbers have clearly this year gone up dramatically, attendant to the publicity and everything else, but they weren't known in those numbers before, and as we did the forensic analysis, just as you suggest, with experts other than our own on tires and individual cases, in virtually all of those cases there were punctures, improper repairs or something that influenced the tire from the outside.

Mr. LUTHER. What opinions have been rendered by the adverse parties in those cases?

Mr. CRIGGER. There have been a variety of opinions that have been rendered.

Mr. LUTHER. Can you share some of them with us?

Mr. CRIGGER. Sorry, these are just—it is not an area that I am—in addition to the kinds of things that I describe, there have been opinions or claims of design defects, certainly manufacturing defects, contamination, other areas.

Mr. LUTHER. Would you be willing to share those opinions with the committee at the request of committee staff?

Mr. CRIGGER. Yes, yes, we will.

Mr. LUTHER. And have some of those cases been settled?

Mr. CRIGGER. I believe they have.

Mr. LUTHER. Are any subject to confidentiality agreements?

Mr. CRIGGER. My understanding is that confidentiality agreements are in place in some cases to protect industry trade secrets.

Mr. LUTHER. And obviously protecting any trade secrets, setting that aside, are you willing to waive those confidentiality agreements in order to get the information to the committee?

Mr. CRIGGER. Other than the necessity to get release from plaintiffs in some of those cases, yes.

Mr. LUTHER. But at least from your standpoint, you are willing to waive them.

Mr. CRIGGER. Particularly settlement amounts and those kinds of things, nontrade secret areas, yes.

Mr. LUTHER. I am referring to the causes here and the information.

Mr. CRIGGER. That is not—my understanding is that that is not subject to confidentiality.

Mr. LUTHER. But in any event, from your standpoint, you will certainly waive that so that the information can be made available.

Mr. CRIGGER. That is correct.

Mr. LUTHER. When did you start doing an internal analysis within your company of these claims?

Mr. CRIGGER. Well, as I mentioned, my understanding is we have always looked at claims, but they have been looked at separately. They weren't part of what I would call the QA review of tire performance, so that data has been looked at.

Mr. LUTHER. And there are documents, internal company documents that reflect these claims——

Mr. CRIGGER. Yes.

Mr. LUTHER. [continuing] and the analyses that have been done?

Mr. CRIGGER. I am sure that is correct. But only in the most recent case, which, of course, is the most serious case, did this become a factor in our discussion of performance.

Mr. LUTHER. But those internal documents again would be available to the committee?

Mr. CRIGGER. I believe they have been provided.

Mr. LUTHER. And if not, any request——

Mr. CRIGGER. We certainly will honor the requests, yes.

Mr. LUTHER. Thank you.

Then, on the final point, on the current advisory from the agency on the 1.4 million tires, when will you be able to decide on that? Because, obviously, any member of this committee can have constituents right now driving with those tires, and I am sure everyone would be very interested in knowing exactly when can we have a firm decision from you on that.

Mr. CRIGGER. I understand we are trying to diligently look at those individual cases. Because, as I mentioned earlier, in many of those, there is only one claim that has generated the rate, and we are trying to do that in a matter of days.

Mr. LUTHER. Okay. So we are looking at a matter of days on each of the categories that fit within that request?

Mr. CRIGGER. I think to review all of the categories.

Mr. LUTHER. Okay. Thank you.

Thank you, Mr. Chairman.

Mr. TAUZIN. If the gentleman will yield, does that mean you will have a public decision within a few days on whether to agree or not agree on these new recalls or expansions?

Mr. CRIGGER. Yes.

Mr. TAUZIN. So we are a matter of days away from a decision?

Mr. CRIGGER. That is correct.

Mr. TAUZIN. Thank you, Mr. Luther.

The gentleman from Illinois, Mr. Shimkus, is recognized.

Mr. SHIMKUS. Thank you, Mr. Chairman.

The first question is pretty basic, and it is to Mr. Ono. Because I have received this question and so I would like for Mr. Ono to answer it, and then I will tell Mr. Ono how I answered the question.

The question posed to me today was, what do I tell the employees at the Decatur Firestone plant? So my question is, if you were asked that question, what would you tell—what is your message to the Firestone employees in Decatur, Illinois, today?

Mr. ONO. As far as my message to the employees at the Decatur plant, I have already issued a message to improve quality even more and have asked for their endeavor in this area.

Mr. SHIMKUS. I was asked that by one of the local medias. Decatur is approximately 30, 35 miles from my district. I do have some of your employees as my constituents. My response to the employees is work with management, produce the best quality tire, and regain the trust of the American people. And that is in the best interests of my constituents who work in your facility and hopefully you can move in that direction.

Mr. CRIGGER. We know we have 2000 dedicated, committed employees in Decatur, and we want to find the root cause so that we can satisfy the country and satisfy Decatur.

Mr. SHIMKUS. Mr. Chairman, that is all the questions I have. I yield back.

Mr. TAUZIN. I thank the gentleman.

The gentlewoman from California, Ms. Eshoo, is recognized for 5 minutes.

Ms. ESHOO. Thank you, Mr. Chairman, for calling this all-important hearing.

I would like to begin by asking the people that are here testifying, when you began to reimburse buyers of ATX and Wilderness tires who experienced this tread separation, when did you start reimbursing them?

Mr. CRIGGER. You mean under the recall program?

Ms. ESHOO. No. Just the very first time that something happened, when did you start to reimburse for the tread separation?

Mr. CRIGGER. Well, if I understand the question, we would have done ordinary warranty adjustments from the first incident or the first presentation——

Ms. ESHOO. Well, I don't think this is ordinary warranty adjustment. I don't think that is what the hearing is about. I think you know exactly what I am asking about. I am not talking about tires that may end up with X number of nails in them. I am talking about the tires that are in question.

So what I am looking to determine from you is, when this began, when was there a reimbursement of these—on the ATX and the Wilderness tires? Maybe I should ask you when you began to reimburse State Farm policyholders or any other policyholders for damages that were sustained from tread separation?

Mr. CRIGGER. Let me see if I——

Ms. ESHOO. I can't believe that this is a clouded question. I mean, I am known for being pretty direct, and I don't know how—let me move on and ask how many reimbursements you made and how much was paid out?

You don't know anything about that either?

Mr. CRIGGER. I am still not sure of your question. I think the first lawsuit that was brought on these recalled tires was in 1994.

Mr. TAUZIN. Will the gentlewoman yield?

Ms. ESHOO. As a result of that, did you initiate any corrective action on your part? Were there any mini-recalls? Was there any change in tire makeup? Was there testing?

Mr. CRIGGER. I don't think there—on each individual case, of course, there is a forensic analysis. In the 1994 case, there was no determination of any tire problem associated with that case, but we do continuous field survey, continuous testing and continuous monitoring of the warranty data.

Ms. ESHOO. So it was so insignificant—this is what I seem to be getting here—it was so insignificant that until the 6.5 million tires were determined to be part of a recall that the action was just so slow that you considered it insignificant?

Mr. CRIGGER. No, it is never insignificant when anyone is injured or there is a loss of life associated with our product.

Ms. ESHOO. So when was the flag raised? What was the determining factor, whether it was reimbursement to buyers relative to the problem? When did the red flag go up with Firestone/Bridgestone?

Mr. WYANT. The decision was made on August 8, and the announcement was made on August 9, and that is when the reimbursement program began.

Ms. ESHOO. There never was any reimbursement before that?

Mr. WYANT. Okay. Reimbursement in a general term in the tire industry. Radial tires particularly come out of service quite frequently due to tread separations or wearout to tread separations; and, in that sense, there is adjustment or reimbursement as a course of business to satisfy customers; and that has been practiced for many years for all tire companies.

Ms. ESHOO. So business was going along just fine until August 8? Is that what you are saying?

Mr. CRIGGER. No, obviously not. Obviously not.

Ms. ESHOO. Why can't you answer that question then? Were there any indicators, any red flags, anything that went up before this debacle, this consumer debacle, public relations debacle for your company, tragedies for families? Was there anything that you ever considered before this that you can share with us?

Mr. CRIGGER. All of the information that we used, the traditional information to evaluate the quality and performance of tires showed these tires to be good tires, effective tires.

Ms. ESHOO. Let me ask, what do each one of you drive? What kind of tires do you have?

Mr. CRIGGER. I have Wilderness tires.

Ms. ESHOO. You have what?

Mr. CRIGGER. I have Wilderness AT tires.

Ms. ESHOO. What have you done? Have you gone to your local dealer?

Mr. CRIGGER. They are not among the recalled population.

Ms. ESHOO. Are you worried about driving them yourself, or your family?

Mr. CRIGGER. No, I am not. Obviously, Firestone is very concerned about this.

Ms. ESHOO. Do you really mean that?

Mr. CRIGGER. We have employees as well—we are a big organization in terms of employees, and our employees drive on these same tires that are being recalled. If we had had any indication that we should do something, we would have done it. We have done the right thing. We reacted when we knew. We wish we knew earlier. Clearly, we wish we knew earlier. None of us—it rips the hearts out of the whole company and the individuals in it to think that people have died on our tires.

Ms. ESHOO. Well, then why are you resistant to the additional 1.4? Where is that resistance coming from and why?

Mr. CRIGGER. We are trying to evaluate that now. But, as I mentioned, in those cases——

Ms. ESHOO. If you didn't evaluate the data before, though, why would the American public trust you to evaluate data fairly now——

Mr. CRIGGER. Clearly, we have——

Ms. ESHOO. [continuing] when the signal only went up on August 8?

Mr. TAUZIN. The gentlewoman's time has expired.

The gentleman may respond.

Mr. CRIGGER. Clearly, we need to regain America's trust. There is no question about that. And we want to do that. We are trying to do that.

Ms. ESHOO. Can the rest of the people at the panel just answer the question?

Mr. TAUZIN. The gentlewoman's time has expired.

I had a request from Mr. Dingell who had to leave early because of his foot injury to make the vote, and he asked for additional time to ask a question. Is there any objection? Without objection, Mr. Dingell is recognized for 2 minutes.

Mr. DINGELL. Mr. Chairman, I thank you.

Gentlemen, your statement says that in its efforts to find the root cause of the problem, Firestone is looking at plant operations in the mid-1990's. This included a period of time when Decatur and other Firestone plants were operated with replacement workers.

Now, I would like to bring to your attention a graph over there which shows in purple the claims rate attributable to tires produced at the Decatur plant during the time it was operated by replacement workers and the claims attributable to that plant after the strike ended in 1996. This graph was prepared at my request by Ford Motor Company who used Firestone's tread separation data. As you can see, claims attributable to production at Decatur dropped dramatically after the strike ended. From January 1995 to November 1996—when replacement workers operated the plant—the claims rate was extremely high: 404 claims per million tires produced. After November 1996, when permanent workers were allowed to return to their jobs, the claims rate attributable to production at the plant fell 55 percent to 183 claims per million tires produced.

Now, I would note that to me, at least, the claims rate of 183 per million is still too high. But the question now is, does this analysis not indicate to you and to me that a significant part of the problem at Decatur occurred during the time the plant was operated with replacement workers?

Mr. WYANT. We don't have any disagreement about the timing. We believe the strike was 1994-1995 with replacement workers, and it is coincident with that peak, and we are looking at that, have been looking at that, and it is still on the table, but we are not here to blame the workers of the Decatur plant.

Mr. DINGELL. It is pretty hard to say it is a coincidence. You had a lower level of failure and complaints and then the strike came. You put in replacement workers. Then you had a significant increase in the number of claims. Then, when the regular workers came back, the level of claims subsided.

Now, what could have caused the ATX 15-inch tires produced at Decatur to account for such a large number of claims during that period?

Mr. WYANT. That is what we are trying to determine through the cause team to find out that same answer. We would like to know what that answer is. We just do not know at this time.

Mr. DINGELL. You have not been just looking at this today. This is a question that has been before you for a long time. Here you have a question of replacement workers in there. It is the only thing that anyone here can point to. Can you point to anything else which would indicate a basis for assuming that this was a cause for this enormous increase in the level of claims?

Mr. WYANT. I am not prepared to say that that is the cause. It is coincident in time. We all agree.

Mr. DINGELL. Now, let us look here. Decatur is not even the largest producer of ATX 15-inch tires. Joliette and Wilson are both larger producers of these tires, are they not?

Mr. WYANT. That is correct.

Mr. DINGELL. Now, you indicated to me earlier that replacement workers were not used in positions that required technical expertise such as inspectors, quality control and awlers. Now, are you able to make—can you tell me who was used to do that kind of work? Was it replacement workers? Was it regular workers who had been doing the work previously? Was it management? Who did that work?

Mr. WYANT. The people that did that work at that time at the initiation of the replacement program were salaried people, they were supervisors, they were QA people, they were lab technicians. And, as I indicated before, we will get you documentation that shows what happened throughout that process. I do not know if that was 100 percent of the way or part of the way.

Mr. DINGELL. All right. Now, it must be observed that in those plants for that kind of work, you did use hourly, blue collar workers, did you not, for inspectors and for awlers?

Mr. WYANT. That is correct.

Mr. DINGELL. That is correct. So you lost the entirety of them, of that body of workers when the strike occurred, did you not?

Mr. WYANT. That is correct, but we——

Mr. DINGELL. That is correct.

Mr. WYANT. But we retained, of course, the supervisors in those areas and other technical people.

Mr. TAUZIN. The gentleman's time has expired.

Mr. MARKEY. Will the gentleman yield briefly?

Mr. DINGELL. If I have time, I will be happy to yield, but I am afraid the 2 minutes are all gone.

Mr. MARKEY. I would just like to follow up on this Decatur question just for a second. When did you find out that there was a higher rate of separations at the Decatur plant than other plants?

Mr. WYANT. The claims data indicated that when we went into the detailed analysis here at the end of July.

Mr. MARKEY. So the end of July was the first time that you knew that you had a higher rate of separation at Decatur than the other plants?

Mr. WYANT. The big indicator was on the claims data. If we look at the adjustment data, there is lesser of an indicator, that is correct.

Mr. MARKEY. Well, let me refer you to—in book 1 here. Do you have it down there? In book 1, tab 25. In book 1, there is a chart on tab 25, a memo to Dave Lobbe from William Thomas. And the date is—let me get the date here. The date is January 19, 2000. So it was the beginning of this year. If we move into this tab and you move about 10 pages in, what you will find is the 1997 separations by plant; and under your own document here it says that 57 percent of the total separations in 1999 came from the Decatur plant.

Mr. TAUZIN. Which, by the way, was 10 percent of the total production.

Mr. MARKEY. And then it lists all the other plants. Moreover, a little bit later, which I am sure was of great concern to you, about 3 pages later in this memo, it says that 62 percent of the total separation costs came from the Decatur plant. So that must have been of great concern to someone in the corporation, that at only one plant 62 percent of your costs were now rising from these separations. This notice that you had of this problem was January 19, 2000.

Moreover, on the first of those pages that I referred you to, it actually has the 1998 numbers as well which shows that the lion's share of the problems in your operation came from Decatur. And I am not talking 20 percent or 30 percent but 57 percent, 62 percent of your problems. Don't you consider that to be notice that you had a serious problem at the Decatur plant?

Mr. TAUZIN. There is a document a year earlier than that, Mr. Markey, in the books that shows the same thing. By the way, my correction, it was 18 percent of total production with 57 percent of separations, but there is a document a year earlier than the one Mr. Markey is citing.

Mr. MARKEY. So following up then on the point that Mr. Dingell made, the temporary workers were hired; they made these tires. In 1998 and 1999, in your own document, you have evidence that the Decatur plant is responsible now for the lion's share of all of the separations of your entire operation. Do you consider that to be notice that you had a serious problem with these tires that were affecting the public?

Mr. CRIGGER. As we discussed earlier, I wish we had looked at this kind of a document in conjunction with our performance in terms of the tires. This was looked at in a different way——

Mr. MARKEY. What was the document prepared for? The document was prepared in order to identify problems at your plant. The document was prepared in order to find out what the liabilities for your company would be because of defects in a product that the public was buying. For what other reason would this document have been prepared other than for you to identify a serious problem at the Decatur plant subsequent to the strike which had led to the production of these defective tires?

Mr. CRIGGER. Clearly, we have a problem at the Decatur plant; and we are trying to determine the cause. It would be easy to blame the replacement workers, but we haven't been able to pinpoint that——

Mr. MARKEY. I am talking about you now. I am not talking about the replacement workers. I am talking about this is a January 19, 2000, memo to you. You did not begin this recall until August.

Mr. CRIGGER. That is correct.

Mr. MARKEY. Why did you wait 9 months? You knew in January that you had a serious problem, and you waited until August to recall the tires.

Mr. WYANT. Just to comment on that, we are not here to make excuses about that, and we have acknowledged that issue. But some of the confusion—confusing factors about this, there was increasing production in this time period, and there is abundance of flotation-type tires that are in this plant, and they are on—substantially on this list, of the 1.4 million, and they are an extraordinary service, much more difficult service, higher percent off the road, and it makes it more difficult to make the analysis clear. As Mr. Crigger said, in hindsight, we should have taken this as a flag and should have done a better job of investigating.

Mr. TAUZIN. Proceeding a little bit out of order now, and we are going to wrap up your testimony in just a second, but I want to follow up on both of my friends' questions. You provided NHTSA and us with this 1998 separations by plant graph that Mr. Markey is citing. Did you prepare one for 1997? We don't have it.

Mr. WYANT. We will check. If we have it, we will certainly give it to you.

Mr. TAUZIN. Is this an annual preparation and do you have them for previous years? If you do, I am making a formal request upon you for those documents.

Mr. WYANT. Yes.

Mr. DINGELL. Mr. Chairman.

Mr. TAUZIN. Mr. Dingell, you have a few seconds left of that 2 minutes I gave you, sir.

Mr. DINGELL. I will try and do it.

I note here that Firestone representatives have told me that during the period between July 1994 and the end of the year, which was before the replacement workers were brought in, the Decatur plant produced 641,325 tires. How many did they produce after that, after the replacement workers were brought in during a similar period of time?

Mr. WYANT. I do not have that information available to me.

Mr. TAUZIN. Would you please supply those production figures?

Mr. WYANT. We can get those figures.

Mr. DINGELL. I am curious how you could have produced this number of tires at Decatur when you apparently had a strike or some kind of difficulty going on.

Well, thank you, Mr. Chairman. You have been very generous.

Mr. TAUZIN. Thank you, Mr. Dingell. Again, we tried to accommodate you. I hope you understand that. We try to accommodate all members, but we also have to accommodate our future panel.

Mr. Ono and Mr. Crigger and Mr. Wyant, at the initiation of this question and answer session, I made a request upon you which you agreed to honor in supplying this committee with all of the test data on these tires. I want you to know why we want it, because we may have future inquiries directed to you.

We are going to want to know whether or not you were aware in 1989 and 1990 that Ford was going to recommend and was, in fact, recommending 26 pounds per square inch in their Ford Explorers and, knowing that, did you, in fact, test in high speed for that pressure. And if not, how is it that you certified these tires to Ford so that they would put them on the Ford Explorer line as it went out to consumers not only in America but across the world? Those are very important questions, and I can't get answers to them because you have failed over the last week to supply us with test data information.

Mr. WYANT. We have been looking for that data almost around the clock, and it is older data and we have not yet found that.

Mr. TAUZIN. I hope it doesn't show up on somebody's coffee table, but I expect to see it as soon as you find it so that we can proceed with these questions.

The record will stay open for 30 days, as is our custom. We reserve the right to submit written questions to you as well as to make further requests for documents. We hope that you will comply.

As I pointed out, we do have the power of subpoena. I would rather not have to exercise it, if you will be as freely cooperative as you have indicated you want to be today.

There have been numerous requests from other members for documents. I hope you have a good list of them, because we do. We will be expecting to see them as quickly as you can obtain them for us.

I don't have to tell you that this is not the end, this is just the beginning of this inquiry. We are as anxious as I hope you are to see this behind us and Americans and citizens of the world who buy your products much safer individuals.

We thank you for your testimony, and you are dismissed.

Mr. WYANT. Thank you very much.

Mr. CRIGGER. Thank you.

Mr. TAUZIN. The Chair will now call the third panel, which will consist of Mr. Jack Nasser, President and Chief Executive Officer of Ford Motor Company in Dearborn, Michigan; Mr. Thomas Baughman, Engineering Director, Truck Consumer Business Group of Ford Motor Company; and Helen O. Petrauskas, Vice President of Environment and Safety Engineering of Ford Motor Company.

The Chair recognizes—it will just be Mr. Nasser. Then we will welcome Mr. Nasser, and the Chair recognizes Mr. Upton to administer the oath to the witness.

Mr. Upton.

Mr. UPTON. Mr. Nasser, we thank you for waiting patiently throughout the day. And as you heard with the first two panels, we have a long-standing tradition of taking your testimony under oath. Do you have any objection to that?

Mr. NASSER. No.

Mr. UPTON. The committee rules allow you to be represented by counsel as well. Do you wish to have counsel?

Mr. NASSER. No, I don't.

[witness sworn.]

Mr. UPTON. You are now under oath, and I yield back to Chairman Tauzin.

Mr. TAUZIN. Thank you, Mr. Upton.

Mr. TAUZIN. Mr. Nasser, as is customary, your written statement is a part of our record. You have 5 minutes to summarize so that we might get into questions and answers. And you are welcome, and, again, my appreciation for your reconsidering and being with us today and particularly for sitting through this long hearing at this point. Mr. Nasser.

TESTIMONY OF JACQUES NASSER, PRESIDENT AND CHIEF EXECUTIVE OFFICER, FORD MOTOR COMPANY

Mr. NASSER. Good evening, Chairman Tauzin and Chairman Upton and members of the committee. I appreciate the opportunity to be here. I know that this has been a very complicated and very sad situation, and we are all concerned.

But before I discuss the Firestone recall, I would like to say a few words about our company. As I think everyone knows, Ford has a distinguished heritage and a bright future, and, without question, it is an American icon. Throughout our history, our strength has been with our employees and loyal customers.

Thirty-two years ago, I joined Ford Australia as a trainee, and I never dreamed some day I would lead Ford Motor Company and represent the Ford team. I am here tonight because I know that you and the public have questions about the tire recall, and I am here to answer those questions, and I will remain here until you are satisfied.

Now, let's get to the heart of the issue. When did Ford know there was a problem with the Firestone tires? What have we done about it, and what are we going to do about it in the future?

Let's start with, first, when did Ford know there was a problem with the Firestone tires?

Now, I have said this before, Mr. Chairman, but I think it is worth repeating. Because tires are the only component of a vehicle that are separately warranted, Ford did not know—I will repeat that—Ford did not know that there was a defect with the recalled tires until we virtually pried the data from Firestone's hands and analyzed it ourselves. It was only then, a few days before the recall was announced, that Ford engineers discovered the conclusive evidence that the tires were defective. We then demanded, insisted that Firestone pull the tires from the road.

Looking back, and it is easy to look back at this point, the first signs of a problem developed in Saudi Arabia, and we have had a lot of discussion on the Middle East and Saudi Arabia during this hearing. It first started when our dealers reported to us complaints.

We immediately asked Firestone to investigate. Firestone did so, and they concluded that the tread separations were caused—and you heard that earlier this evening—by improper maintenance and road hazards that are unique to that environment.

I have to say that we were still very troubled by that explanation, so we didn't stop there. We then asked Firestone to conduct all sorts of tests on those tires, and after each and every test Firestone reported there was no evidence of a defect. This did not satisfy our Saudi customers; and, for us, customers are paramount.

So, about a year ago, Ford replaced the Firestone tires. We replaced them with Goodyear tires, because we had no choice. We did it because we put our customers first.

I should add that at the very same time that we were going through those issues in Saudi Arabia, we wanted to know if our U.S. customers were having tire problems. This goes back to early last year when we asked Firestone to review its data, and we were assured at that time that there was absolutely no problem in the U.S. Our data as well as government safety data didn't show anything either, so we had nothing to go on at that point. Firestone was saying, no problems. The government data suggested there weren't any problems. Our own data, which is limited because we don't warrant the tires, suggested no problems.

We still felt that we should do more. We didn't want to stop there. We kept on going, and we asked Firestone for one more evaluation, a deep-dive, thorough evaluation, particularly in the Texas, Nevada and Arizona area, because that is where a lot of these tires and a lot of the volume happened to be. Firestone reported back, as before, that there was absolutely no defect, and you heard some of that earlier this evening.

My purpose isn't to finger-point—that is not what this is about—but simply to tell you that at each and every step, Ford actively, proactively took the initiative to uncover the tire problem and to try and find a solution. But it was not until Firestone's confidential claims data became available to us that it became clear that something had to be done. Looking back, particularly after listening to the testimony this evening, if I have one single regret, it is that we did not ask Firestone the right questions sooner. That is my single regret, that we didn't ask them the right questions sooner.

So what have we done so far? Because we are here and we have to try and find a solution. We started by insisting that Firestone recall the bad tires. I can take you through a chronology of that later, if you wish.

I then made a commitment to our customers that Ford would dedicate all of its resources to support the Firestone recall. In just 3 weeks over 1.7 million tires have been replaced.

We also worked very closely with Firestone's competitors, the global tire industry, to increase tire availability. I spoke to the heads of every one of those companies to encourage them to get good tires into the U.S. market as quickly as possible. We also suspended production at three of Ford's plants, because we wanted to free up more replacement tires for the recall.

In summary, we did everything we possibly could to replace bad tires with good tires as quickly as possible.

Now, looking forward, what are we going to do? Because I share the sentiment of the committee. That is the most important thing. We can't let this go on.

Mr. Chairman, there are almost 3 million Goodyear tires on Ford Explorers that have not had, as far as we know, one tread separation problem—3 million tires on Explorers. So we know that this is a Firestone tire issue, not a vehicle issue. But we stand back from it and say we have got to make sure it just doesn't happen again.

So today we are announcing—and I think this has to be done jointly with NHTSA and the committee and with the cooperation of other manufacturers and the global tire industry—that we implement two new reforms that we feel are critical for customer safety going forward.

First, we will work with the tire industry to implement an early warning system. This early warning system will be designed to detect the first sign of tire problems on vehicles already on the road; and this reporting system must use comprehensive, real-world data that we now know is so critical to spotting defect patterns.

Second—and this was mentioned earlier by the safety agency—because everyone's products and our products are increasingly sold around the world, this is a global marketplace, we will advise U.S. safety authorities of safety actions that are taken in overseas markets and vice versa. From now on, when we know it, so will the world.

I have to say that I have received hundreds of letters from Ford owners, and I have spoken personally with many of them, and, believe me, some of these conversations have been extremely difficult. I want you and all Ford owners to know that we at Ford will not rest until every bad tire is replaced. I will do everything in my power as the President of the Ford Motor Company to maintain the confidence and the trust of our customers.

Thank you, and I would be pleased to answer your questions at this time.

[The prepared statement of Jacques Nasser follows:]

PREPARED STATEMENT OF JAC NASSER, FORD MOTOR COMPANY

Good afternoon, Mr. Chairman, members of the Committee. I am Jac Nasser, President and CEO of Ford Motor Company. I have been with Ford Motor Company for more than 30 years in a variety of positions around the world. I am proud of the great contributions Ford Motor Company has made to improving the standard of living of millions of people around the world. I am driven to make sure that everything we do serves all customers, and clearly their safety is uppermost on our minds. For that reason, I am deeply troubled by the fact that there are defective tires on some of our vehicles.

As you know, Firestone manufactured and warranted these tires. However, because so many of these tires were used as original equipment on Ford products, we have taken extraordinary steps to support this recall and ensure the safety of our customers. Ford Motor Company is absolutely committed to doing the right thing to protect our customers and to maintain their trust.

Throughout this period, we have been guided by three principles. First, we will do whatever we can to guarantee our customers' safety. We are committed not only to their physical safety, but also their feelings of security when driving our vehicles. Second, we are working hard to find and replace bad tires with good tires. That includes making sure that we understand the scope of the problem and finding the cause of the problem. Third, we will continue to be open about any data, statistics or information that we have, and will share anything new as soon as we know it.

Because I don't want there to be any question about our openness, I wanted to personally discuss Ford's actions with you at this hearing.

Actions We Have Taken

Now, let's talk about the actions Ford has taken to support the recall and why we believe these are the right actions.

First, this is a tire issue, not a vehicle issue. We have millions of Goodyear tires on 1995 through 1997 Explorers—the same specification tire operating under the same conditions—and they haven't experienced these problems.

Furthermore, the Explorer is one of the safest SUVs on the road. Proof of this is our exemplary safety record over the last decade. The most recent data from the Department of Transportation show that the Explorer has a lower fatality rate than both the average passenger car and competitive SUV, as shown in Attachment 1. Additionally, Explorer's fatality rate in rollover accidents is 26 percent lower than other compact SUVs (Attachment 2).

Second, we strongly support Firestone's decision to recall 15" ATX and Decatur-built Wilderness AT tires. Based on the Firestone data we have, we've determined that these tires are problem tires. Charts summarizing our detailed analysis of the Firestone data are included in Attachments 3 through 11.

What we still don't know is why these tires fail. We are working hard on that.

Customer Focus

As I said, our top priority is to replace faulty tires as fast as possible. I'd like to highlight a few of the many things we have done to support Firestone's recall and speed replacement. As of September 1, about 1.5 million tires have been replaced—about 23 percent of the total population of affected tires. We worked with the tire industry to increase production of 15-inch tires by more than 250,000 tires per month by the end of September. We have suspended production at three assembly plants, adding approximately 70,000 tires to the replacement population. We have engaged 3,100 Ford and Lincoln-Mercury dealers to perform tire replacements.

We've also made a major effort to communicate information about the Firestone recall to our customers. For example, we have opened an additional call center to deal specifically with inquiries on the tire recall. We are using our website to provide detailed information on the recall action. And we are running national and local newspaper and television ads to alert customers to the recall and show them how to tell if their vehicles are affected.

Overseas Actions

I would also like to comment on our actions overseas. When reports of tread separation in the Middle East came to our attention, we asked Firestone to investigate. They concluded that the tire failures were due to external causes, such as poor repairs, road hazard damage, and extreme operating conditions. But given the problems our customers were having, we decided to replace the tires with a more puncture resistant tire.

Another market where we have experienced tire problems is Venezuela. The situation in Venezuela is complicated by the fact that about three-quarters of the tires were locally produced. Again, Firestone concluded that the tread separations were caused by poor repairs, road hazard damage, and extreme operating conditions. In May, we began replacing all the Firestone tires on Ford Explorers and certain light trucks in Venezuela.

Concern about the safety of all of our customers, including our U.S. customers, drove us to look aggressively for evidence of a defect in the U.S. at the same time we were taking actions overseas. I share this with you, not to finger point at Firestone, but simply to tell you what we did. As early as April of 1999, we were searching all available data bases—our own and the government's. We asked Firestone to check its records. And we had new tires tested under three separate, severe test conditions to try to cause tread separation to happen. Last Fall, we kicked off a tire inspection test program in the Southwest of the U.S. No defect trend was found.

When NHTSA opened their investigation, and required Firestone to assemble and provide data on property damage, personal injury, and lawsuits, Ford insisted on obtaining the data as well. When we received the data late in July, we quickly analyzed it and identified the problem tires that were recalled August 9.

It has been standard practice in the automotive industry that tires are the only part of the vehicle not warranted by the vehicle manufacturer. They are the only part for which vehicle manufacturers do not receive field performance data. At Ford, this will change.

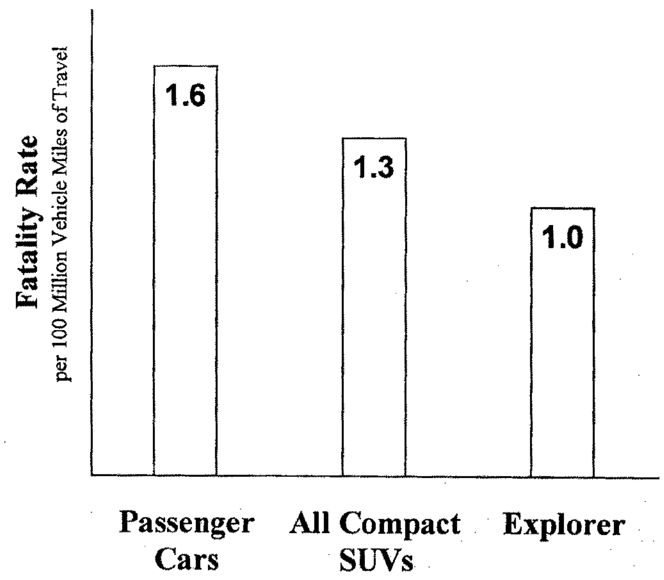
Through all this, we were always open and sought only to find the facts and do the right thing for our customers.

Conclusion

Our mission remains to replace bad tires with good tires as quickly as possible. The safety, trust and peace of mind of our consumers are paramount to Ford Motor Company.

Attachment 1

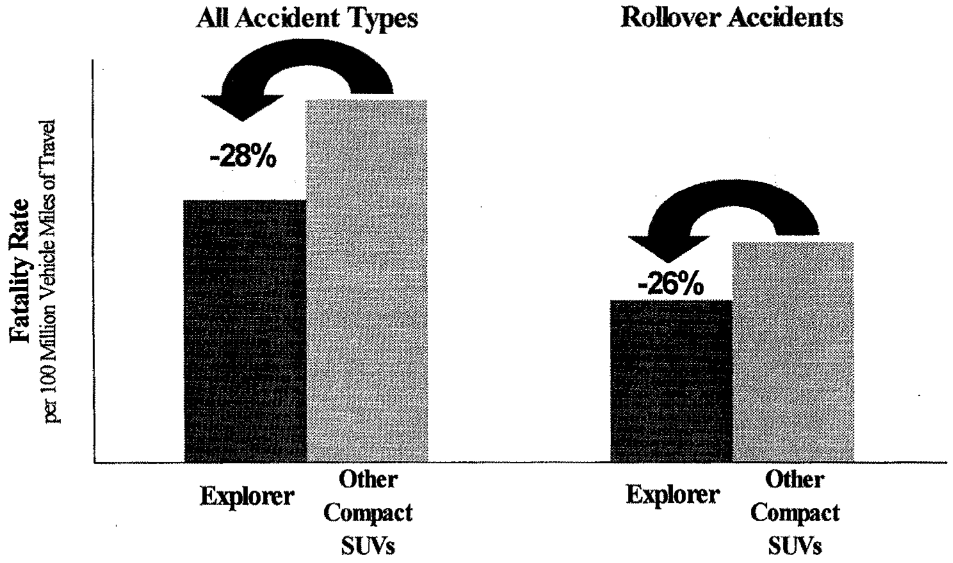
Fatality Rate Comparison



Source: Department of Transportation Data

Ford Motor Company

Fatality Rate Comparison



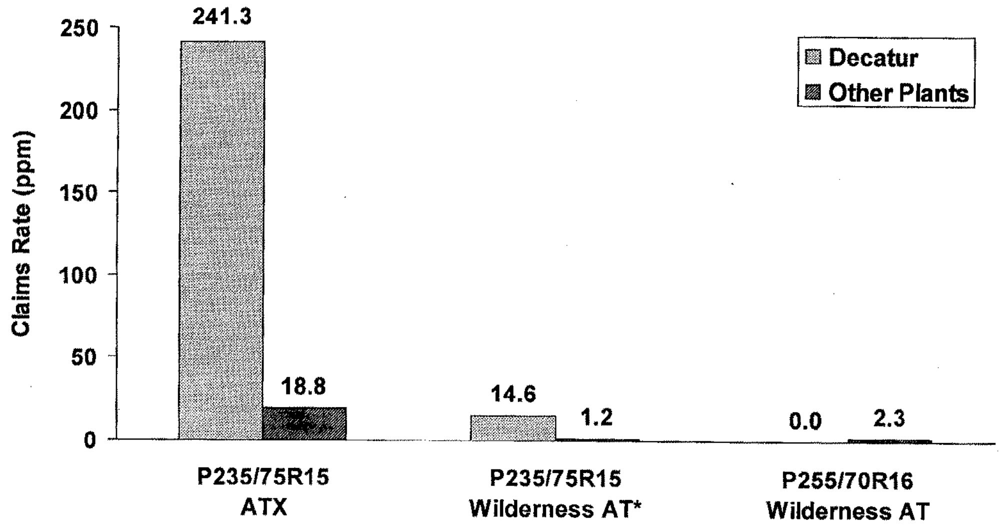
Source: Department of Transportation Data

Ford Motor Company

Attachment 3

Tread Separation Claims Rate for Firestone 15-inch and 16-inch Tires

Production Years 1995-1999 and Claims Years 1995-1999

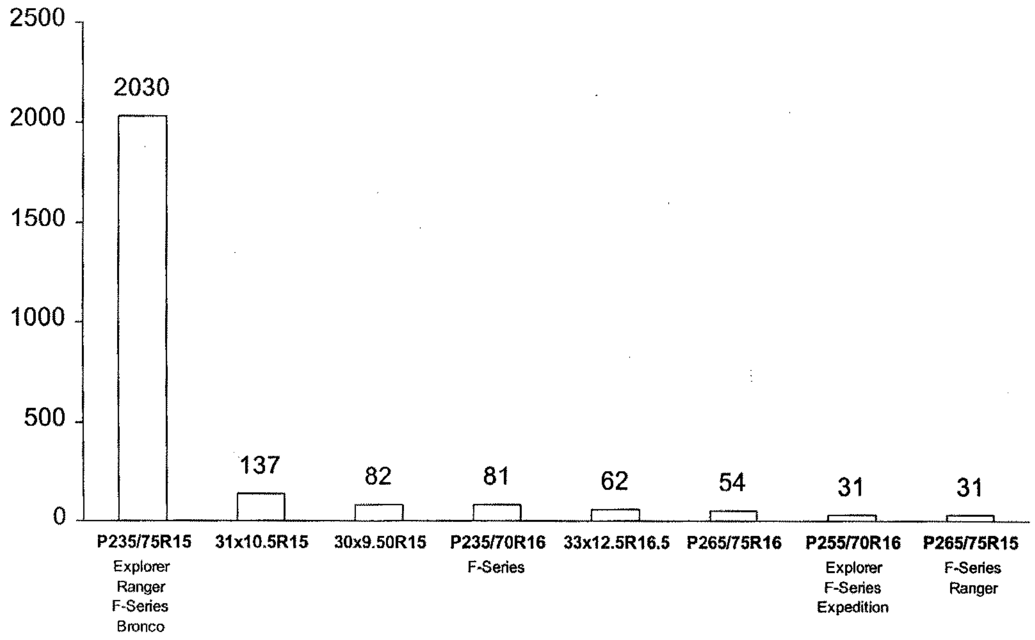


* P235/75R15 Wilderness AT 15-inch production began in 1996

Ford Motor Company

Attachment 4

Claims for Firestone Tires by Tire Size

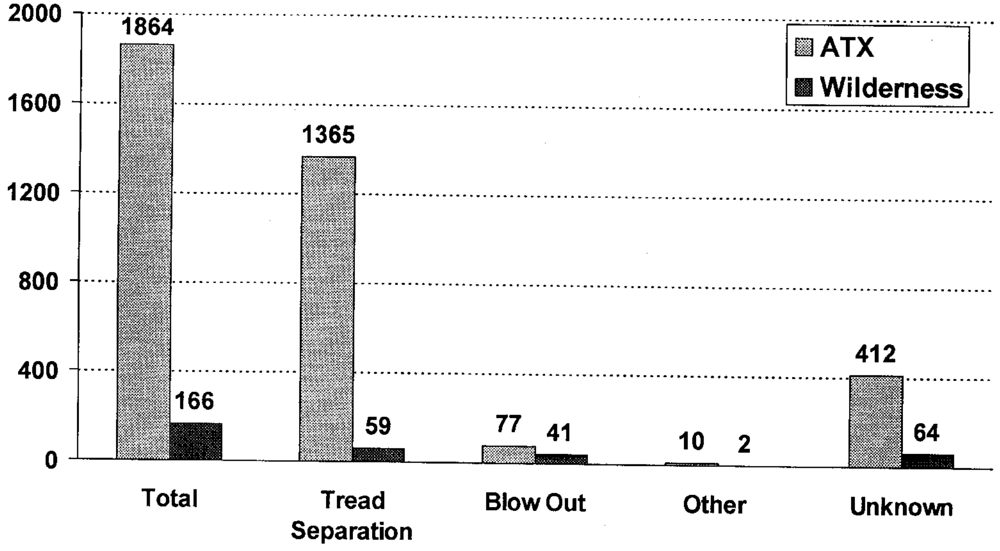


Firestone Property Damage and Injury Claims and Lawsuits Submitted Pursuant to NHTSA Inquiry
Tire Sizes with More Than 30 Claims
Tires with Ford Original Equipment Application Noted

Ford Motor Company

Attachment 5

Claims for Firestone P235/75R15
ATX and Wilderness Tires by Type of Claim

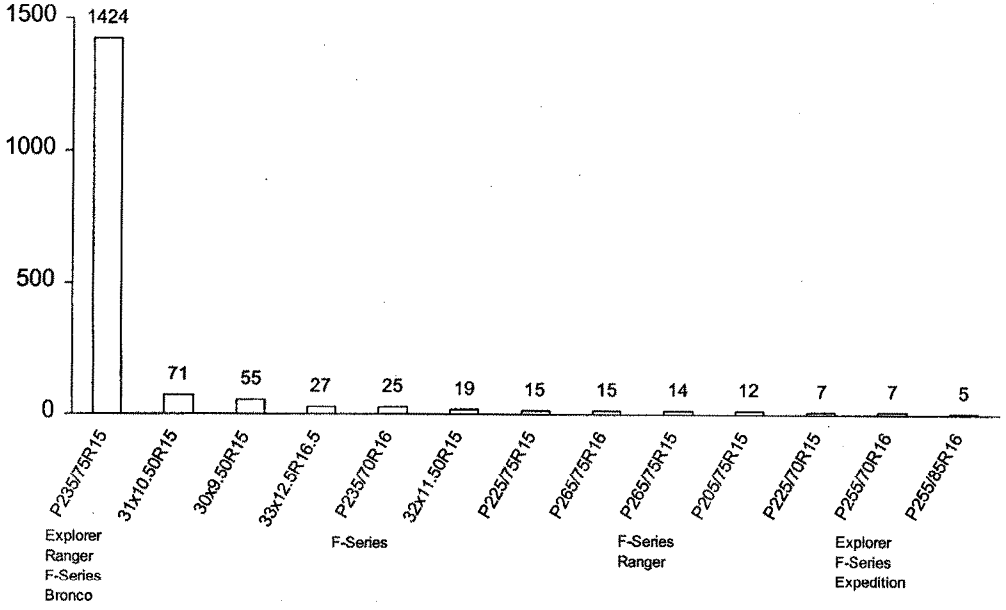


Firestone Claims Data

Ford Motor Company

Attachment 6

Tread Separation Claims for Firestone Tires by Tire Size

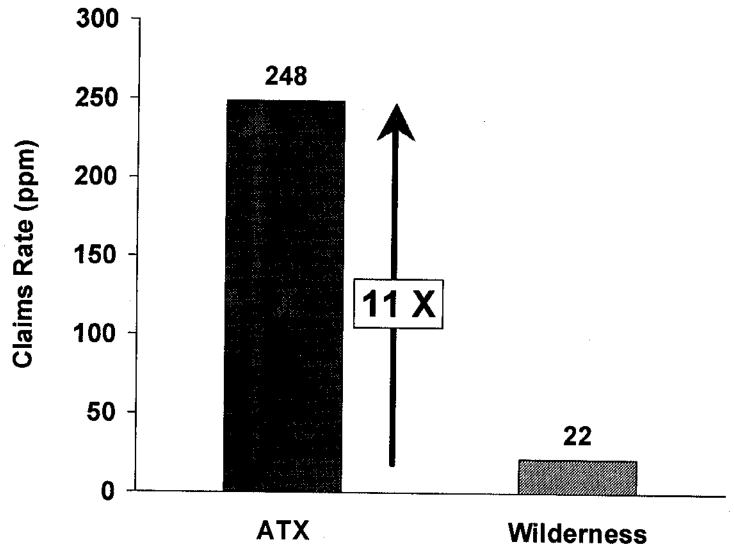


Firestone Claims Data
Tire Sizes with at least 5 Tread Separation Claims
Tires with Ford Original Equipment Application Noted

Ford Motor Company

Attachment 7

Tread Separation Claims Rate for Firestone P235/75R15 ATX and Wilderness Tires for 1996 Tire Production Year

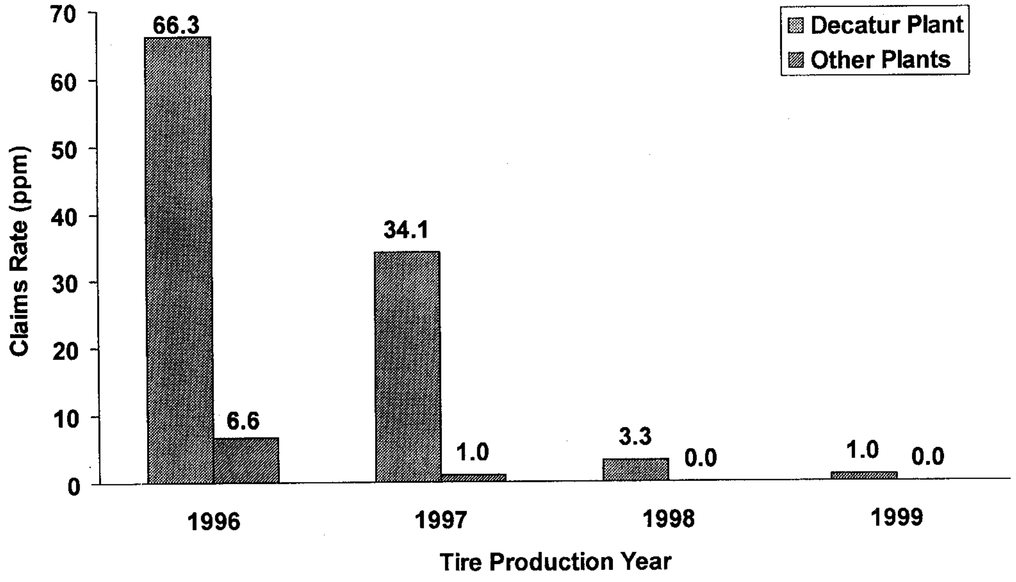


Firestone Claims and Production Data

Ford Motor Company

Attachment 8

Tread Separation Claims Rate for Firestone P235/75R15 Wilderness Tires by Tire Production Year and Plant

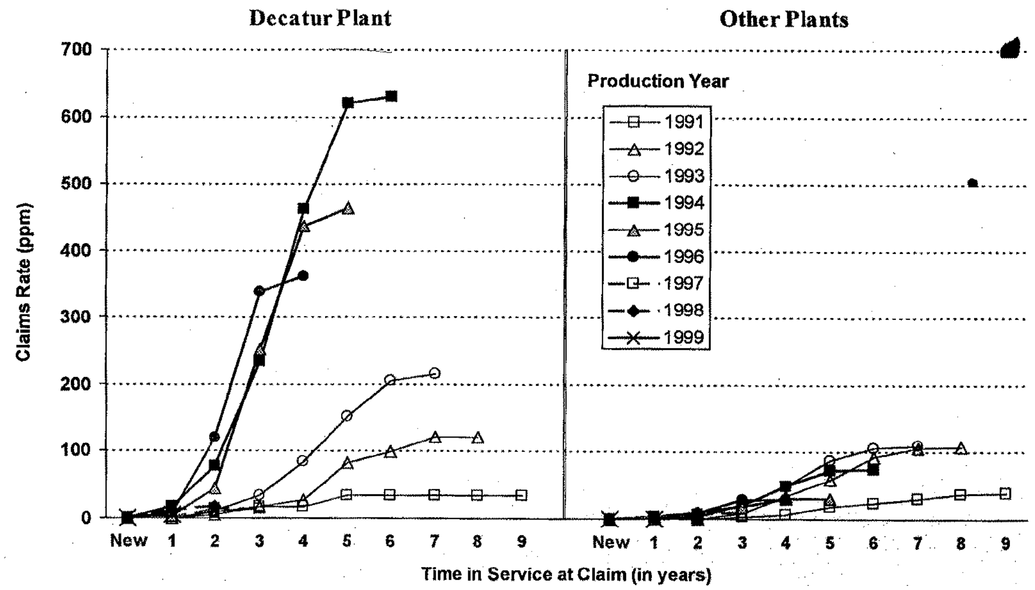


Firestone Claims and Production Data

Ford Motor Company

Attachment 9

Tread Separation Claims Rate for Firestone P235/75R15 ATX
by Time in Service at Claim, Tire Production Year, and Plant



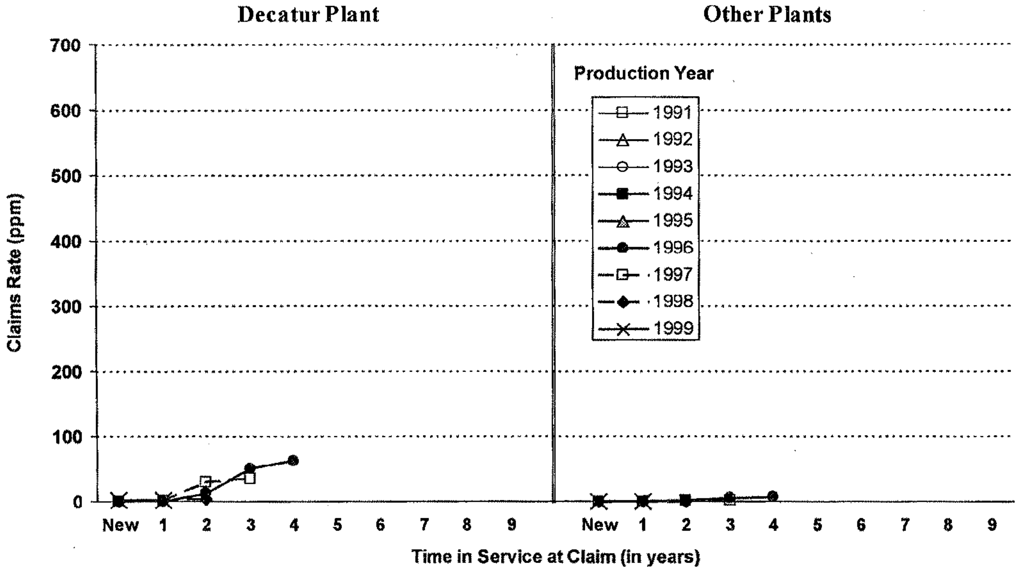
Firestone Claims and Production Data

Ford Motor Company

Attachment 10

Tread Separation Claims Rate for Firestone P235/75R15 Wilderness

by Time in Service at Claim, Tire Production Year, and Plant

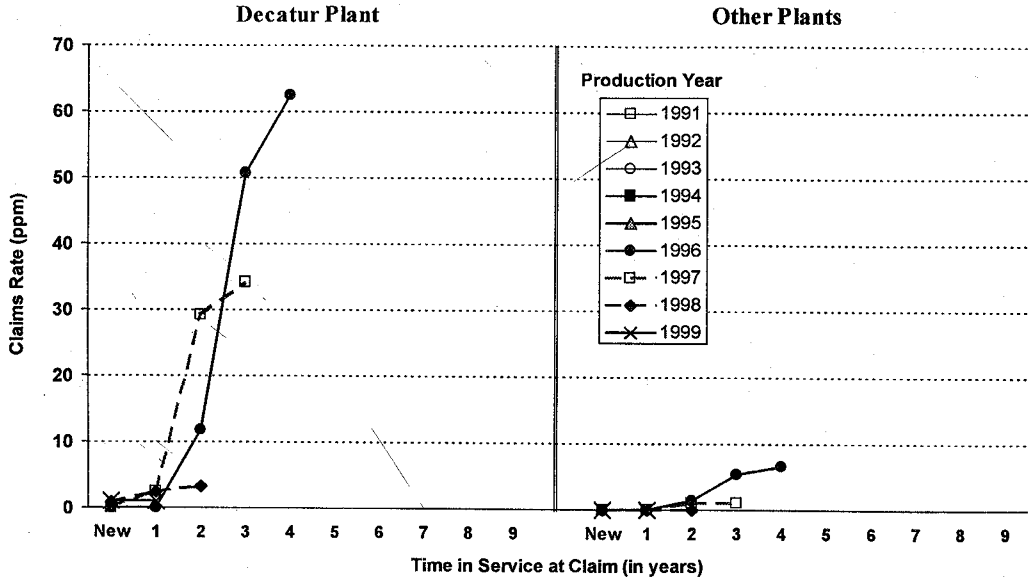


Firestone Claims and Production Data

Ford Motor Company

Attachment 11

Tread Separation Claims Rate for Firestone P235/75R15 Wilderness
by Time in Service at Claim, Tire Production Year, and Plant



Firestone Claims and Production Data

Ford Motor Company

Mr. TAUZIN. Thank you, Mr. Nasser.

The Chair recognizes himself.

Let's first examine indeed what Ford knew and when Ford knew it. You candidly admitted that you regret not asking Firestone early enough for data. Our evidence is that you, in fact, asked for the claims data after NHTSA began the investigation, is that right?

Mr. NASSER. Can I take you through the chronology at this point, Mr. Chairman?

Mr. TAUZIN. Well, I won't have time for the whole chronology, but am I right on that point?

Mr. NASSER. It won't take long. We requested it on June 6. That was the first request. Our second request was on July 11. Our third request was on July 15. Our fourth request was on July 20. We finally received the data on July 28.

Mr. TAUZIN. Well, let's look at the data, and help me with this. These are claims brought by claimants whose tires caused them to have an accident, in their opinion. And of this 1,800 claims, about 1,400 involved, we are told, Ford Explorers, about that number. Was Ford Motor Company not sued in these same lawsuits?

Mr. NASSER. I am sure we had lawsuits, but we never knew what the problem was.

Mr. TAUZIN. Was Ford a part of the lawsuits?

Mr. NASSER. I am sure we were.

Mr. TAUZIN. In the context of Ford being sued along with Firestone, did you not also as a company keep claims data?

Mr. NASSER. We did not have claims data on tire problems.

Mr. TAUZIN. So you don't have and never kept the same kind of claims data that Firestone had?

Mr. NASSER. We do not keep claims data on tires.

Mr. TAUZIN. Did you keep records of complaints by Ford dealers about these tires?

Mr. NASSER. I don't think that we actually get a very good data base on that.

Mr. TAUZIN. What is your service hotline all about?

Mr. NASSER. It is a method where customers and dealers can call in.

Mr. TAUZIN. I want to take you to one. Document 71, page 3. It is dated 8-19-96, pretty early in this process, and it is a report summary to the tech service hotline from apparently a dealer, I can't tell which dealer it was, but it says "tires make a knocking, thumping noise. You can see the tire belt distort if you spin them up. Dealer has 16 Explorers like this. What can be done. Balancing has no effect. You have to replace the tires."

It is a clear indication from a dealer to your service hotline that there is a tire problem out there dated 8-19-96.

Did a report like this to a hotline not raise a red flag at Ford that there was a tire problem on its Explorers?

Mr. NASSER. If you go back to our history of the defects at any time, whether in the U.S. or anywhere else, we tried to get to the bottom of the defects. When you are selling 7 million vehicles a year, of course we will have calls that relate to service issues.

Mr. TAUZIN. You get my drift. There is a lot of stuff going on. A lot of tires are failing. You are being sued and Firestone is being sued. Dealers are issuing calls to your hotline, 16 Explorers at one dealer.

Mr. NASSER. Mr. Chairman, let me just add a comment. 16 Explorers, we don't want one Explorer that has any problem. But if you look at the safety record of Explorer, if you look at the quality level of Explorer.

Mr. TAUZIN. Mr. Nasser, you don't have to sell me. I bought an Explorer already. I am an Explorer owner.

What I am trying to ask you, when your dealer calls a hotline and says we have 16 Explorers where the tires can't be balanced because the tire belt distorts when you spin them, you have to replace these tires, that seems to tell me as a motor company that Firestone is selling me some defective tires. Wouldn't that tell you that in 1996?

Mr. NASSER. Looking back on it now, that certainly seems that is the case. We went into a rigorous review and analysis of every one of those cases.

Mr. TAUZIN. I want to point you to document 54 as well. It is Ford document dated 9-14-99, which is your customer complaint system, and it indicates that you found 32 possible tread separation claims on Firestone and Goodyear. So you are at least getting information from customers that these tires supplied by Firestone are giving you problems, and Goodyear, by the way. Ten of 32 possible claims were from Goodyear and this is dated 9-14-99. Ford is during this period receiving information from its customers and from its dealers that somebody is giving you bad tires.

Mr. NASSER. That is why throughout this period we kept requesting more data, trying to understand it. As you said, these were possible tire issues.

Mr. TAUZIN. Let's talk about what Ford could have known had some things happened, and I want to find out if they happened. You heard me ask about testing. Did Ford in the early stages of producing the Explorer and equipping them with Firestone Wilderness and ATX tires, in those early stages, 1989, 1990, did Ford request Firestone to do a high speed test at 26 pounds per square inch recommended pressure? MR. NASSER. We did. We asked Firestone to conduct high-speed tests on those tires at 26 psi.

Mr. TAUZIN. At high speed?

Mr. NASSER. At all types of conditions.

Mr. TAUZIN. Did you receive evidence that they did so?

Mr. NASSER. Let me go through the analysis that we went through and then I will answer your question directly. We did tell Firestone to conduct high-speed tests on these tires using the 26 psi. The air pressure was in the specifications that we gave to Firestone, and that is the specification and the certification that Firestone signed off on. And as you heard, Firestone said publicly that 26 psi is okay.

In addition, because——

Mr. TAUZIN. You interpret your specs to require them to do testing.

Mr. NASSER. Exactly. But we still weren't quite sure. So in addition to that we ran tougher tests and we ran those vehicle tests at 26 psi on those Firestone tires.

Mr. TAUZIN. Do you have records?

Mr. NASSER. We will give you the records. They go back to 1989 and also to 1994. The tests are 200 miles an hour, at a minimum of 100 miles per hour.

Mr. TAUZIN. At 100 miles an hour, not 200, I hope.

Mr. NASSER. 200 miles at 100 miles an hour.

Mr. TAUZIN. That is more like it. I have an Explorer, and it will not do 200.

Mr. NASSER. We will put a super charger on it for you, Mr. Chairman. In addition to that, we also did tougher tests that include durability tests and J-turn tests, and at that point we were still very sure that these tires would meet every durability that we had.

Mr. TAUZIN. Firestone certified the tires to you after you sent the specs to them. Did they specifically send you any test data that they may have run on the tires for speed testing at 26 psi?

Mr. NASSER. I am not aware of that and I don't think that we have that.

Mr. TAUZIN. What about in process testing, did you request Firestone to continually test in process these tires through the years of manufacture and sale to Ford Motor Company?

Mr. NASSER. In the spring of 1999, when there were allegations of tire pressure issues, we asked Firestone to do tough tests, high speed tests, durability tests and they did that at 20 psi.

Mr. TAUZIN. I understand those special tests. I am asking for regular, routine, in process testing.

Mr. NASSER. We did not.

Mr. TAUZIN. Did not. Let me make the same request upon your company that I made upon Firestone and ask you if you will cooperate. Will you supply this committee with all of the documentation of whatever tests were run on these tires at high speed under the pressure that you recommended consumers drive your Ford Explorers?

Mr. NASSER. Of course we will.

Mr. TAUZIN. Let me turn quickly to the question of the Saudi Arabia business. You made a great commitment here today, Mr. Nasser. You are going to tell not only our Federal agencies but other agencies around the world when you discover problems. That is obviously the way that it should be, but that was not the way that it was in 1999 in Saudi Arabia. Why not?

Mr. NASSER. If you go back to Saudi Arabia and look at the history, we didn't really have any good information. We knew there were problems. We didn't know what the problems were. We kept going back and trying to find out. We kept asking Firestone. Finally in desperation, in desperation, we moved from Firestone tires to Goodyear tires. We did that because we wanted to give our customers more durable tires.

Mr. TAUZIN. But in the Ford memo that we have often quoted, where there is a mention of Firestone legal team being concerned about the DOT, noticing what was going on in Saudi Arabia, there was a second page. It was redacted from the first copy that we got from Ford but you have since supplied it to us. On the second page there is a reference to the fact that Lieutenant Corey McGiffrey in the OGC was asked last Monday about the proposal, he didn't think that working on a case-by-case basis with the owners of the damaged vehicles presented a problem, but he was concerned about the implications of owner letter, and in parentheses, “similar to the Firestone concerns.” He was going to check with one of his colleagues and get more information. This seems to imply that Ford was in this memo saying that they shared Firestone’s concerns that the Department of Transportation in America would find out what was going on out there.

Mr. NASSER. That was a Firestone concern. We didn’t head in this direction. We didn’t go in this direction. We went and replaced those tires with Goodyear tires.

Mr. TAUZIN. But what I am saying is the memo your company supplied to us seems to indicate that your own people shared the Firestone concerns that——

Mr. NASSER. I agree with that.

Mr. TAUZIN. [continuing] the Department of Transportation might find out about this.

Mr. NASSER. I agree. That is why we are proposing in the future we take away those fears and it becomes open and transparent.

Mr. TAUZIN. Why didn’t you let DOT know in 1999 what was happening in Saudi Arabia?

Mr. NASSER. Because at the same time everything that happened in Saudi Arabia, we went back to Firestone and we said check the U.S., are there any potential issues in the U.S.? And the answer was always no. Nothing. By the way, those same tires, those 16-inch tires are exceptional tires.

Mr. TAUZIN. I understand, Mr. Nasser. But when we read a document that says that your people share the concerns of Firestone that the DOT not find out about this, it raises a specter that both you and Firestone preferred that our agency for safety in America not know what was going on in Saudi Arabia. I deeply appreciate your commitment to make sure that never happens again, but do you understand the implications of that kind of concern?

Mr. NASSER. I do. It isn’t shared in our hearts and it isn’t what we are about in the company.

Mr. TAUZIN. The Chair recognizes the gentleman from Massachusetts, Mr. Markey.

Mr. NASSER. Mr. Chairman, I would also like to add one further point. I don’t want to leave the impression that what we did in Saudi Arabia was something that we handled in a secret manner. This was handled openly with the dealers. There was a service recall bulletin, so it wasn’t something that we did at midnight. This was an open replacement program for our customers.

Mr. TAUZIN. But the whole concern, the whole idea of not doing a formal recall——

Mr. NASSER. This is a formal recall.

Mr. TAUZIN. My understanding is if you go back to the first page, that one of the reasons why apparently Firestone wanted you to do it and take responsibility for it was because they did not want to be part of a plan to notify customers and offer them an option because of DOT finding out about it.

Mr. NASSER. Mr. Chairman, I respectfully disagree with you. That is Firestone’s opinion. We disagreed with that. We went ahead and replaced the tires with Goodyear tires and we did it with a service recall bulletin.

Mr. TAUZIN. If you disagreed with Firestone, why weren't you willing then to notify the U.S. Government agency that you were replacing these tires?

Mr. NASSER. Because at the very same time we asked Firestone whether they had an issue here in the U.S. and there is a letter in the file that you have that specifically said absolutely not. And at that point we went straight to Goodyear.

Mr. TAUZIN. The Chair recognizes Mr. Markey.

Mr. MARKEY. Thank you, Mr. Chairman.

Would you support giving rollover test results to customers in the showroom when they are purchasing vehicles from the Ford Motor Company?

Mr. NASSER. We do. Anything that can help communicate safety, that can get the message across on better products we support. Maybe at this point, Mr. Chairman, if I may, I would like to show a chart on Explorer because I think there has been a lot of discussion on Explorer and many of you are Explorer owners and I know many people in America, families in America own Explorers. I want to share this data with you because Explorer—SUVs in general are safer than cars. The Explorer is one of the safest SUVs. In addition to that, there was an issue of rollover. Explorer is better than the average SUV in terms of rollover by almost 30 percent. So every way that you look at it, whether you look at the five star ratings given by the government, we have more five star ratings at Ford. That is the top safety rating. We have more than any other company in the U.S. So anything that communicates safety——

Mr. MARKEY. So you would accept a requirement that all of this information be made readily available to a consumer in the showroom?

Mr. NASSER. Yes.

Mr. MARKEY. Do you oppose the effort in the Senate to block NHTSA's ability to be able to conduct tests on rollovers and to impose reporting requirements? Do you oppose that effort in the Senate?

Mr. NASSER. We do not.

Mr. MARKEY. You support——

Mr. NASSER. What we would like to do is to make sure that the stability index, if that is what you are talking about——

Mr. MARKEY. Do you want to block NHTSA's ability to have rollover tests and reporting requirements? There is now an effort in the U.S. Senate to prohibit NHTSA from doing that. Are you with NHTSA on that issue or are you opposed to NHTSA?

Mr. NASSER. There are two issues. One is a stability index. We feel that anything that can further stability and safety and can communicate what that is we are for it, and NHTSA has a proposal and we support that proposal.

Mr. MARKEY. Do you support giving the agency the ability to figure out what is best for safety in the SUV area for the American consumer?

Mr. NASSER. Yes, we do with cooperation from the manufacturers.

Mr. MARKEY. Do you support the Senate's effort to block NHTSA's ability to put these new regulations on the book?

Mr. NASSER. I am not aware of the Senate's effort. We support any safety action that is sensible and has real world improvements for customers.

Mr. MARKEY. That leaves you enough wiggle room to come back tomorrow and say you don't believe that proposal in the Senate right now is unreasonable and that is what is troubling to me. If you don't know what this proposal is in the Senate, then you are really calling into question our ability to really give any credibility——

Mr. NASSER. I am saying that we will support any real world improvement in safety. And if the proposal supports that, we will be 100 percent behind it.

Mr. MARKEY. It would be helpful that you would submit in writing your position on that issue.

Mr. NASSER. We will do that.

[The following was received for the record:]

Ford Motor Company

L.W. Camp, Director
Automotive Safety Office
Environmental and Safety Engineering

August 30, 2000

The Honorable Sue Bailey, D.O.
Administrator
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Subject: **Consumer Information Regulations – Rollover Prevention, Docket No. NHTSA-2000-6859: Notice 1 (65 Fed. Reg. 34998-35023, June 1, 2000)**

Ford Motor Company (Ford), with offices at the American Road, Dearborn, Michigan 48121, as a manufacturer and importer of motor vehicles, which includes the following brands - Ford, Aston Martin, Jaguar, Land Rover, Lincoln, Mazda, Mercury and Volvo, hereby submits comments in response to the invitation contained in Docket No. NHTSA-2000-6859 entitled "Consumer Information Regulations; Federal Motor Vehicle Safety Standards; Rollover Prevention" published in the Federal Register of June 1, 2000, (Volume 65, 106 Fed. Reg.34998 et seq.). Ford also participated in generating and supports the technical concerns raised regarding the specific proposed use of static stability factor (SSF) to represent a numerical rollover risk, which are addressed in detail in the Alliance of Automobile Manufacturers (AAM) comments.

Introduction

The notice requests comments and information regarding NHTSA's intent to include a vehicle measure of rollover resistance, its SSF, as an addition to the 2001 New Car Assessment Program (NCAP). We understand the agency's objective is to enable consumers to make informed choices about the tradeoffs that arise because of a vehicle's attributes, including high ground clearance, large cargo space, narrow track width and dynamic rollover resistance. As a general proposition, we strongly agree with this objective and believe it has merit. We are willing to assist the agency in achieving its objective of providing accurate consumer information that can increase overall vehicle safety. For the reasons set forth in detail in the AAM comments, however, we do not agree that the agency's attempts to create a five star rating scale based on a statistical analysis of real world "rollover risk" will provide consumers with accurate, reliable information to assist them in making vehicle purchasing decisions. In that regard, this response contains an alternative proposal that maintains the essential framework of the agency's proposal, a five star NCAP rating system based on SSF. However, we propose to modify the agency's proposal by substituting vehicle classifications for the agency's statistical approach. Our reasons for making this proposal are contained below.

Ford understands that NHTSA's proposal to develop a consumer information program follows the agency's decision to terminate rulemaking on a performance standard for minimum rollover resistance. Ford supports that decision and believes that there are at least three critical problems with attempting to specify a performance standard for minimum rollover resistance:

1) Driver and environmental factors predominate as causes
2) While rollover crashes are rare, all vehicle types, including passenger cars, minivans, sport utility vehicles (SUVs) and pick-up trucks, are involved in rollovers, and
3) Some light truck vehicles must be different than cars to perform their intended function.

Any performance standard likely to have a noticeable effect on the rate at which rollover crashes occur, would likely eliminate useful vehicle types that can be and are safely used today. It also would not address those driver and environmental factors that predominate as the causes of rollover crashes.

Ford also wishes to comment on the title of the proposed information program, which contains the term "Rollover Prevention". Ford suggests that "Resistance to Rollover" is a more appropriate title because in Ford's view, rollover prevention, while a noble objective, is not a reasonable goal for consumer information efforts nor is it a goal that is achievable by vehicle design initiatives within current technology. Vehicle designers can influence vehicle characteristics that play at least some role in rollover resistance but the occurrence of nearly 9,000 fatal rollover crashes per year in the United States, two-thirds of which occur in general-purpose passenger cars, make two things clear:

1) It is a fact that all motor vehicle types, including low, wide sports cars, are involved in rollover crashes so that "Rollover Prevention" will not be achieved by even such measures as banning light trucks from, and allowing only general-purpose passenger cars in, the vehicle fleet.
2) Rollover crashes occur principally because of factors that arise from sources not controllable by vehicle design. Therefore, providing simple dimensional information related to SSF's for motor vehicles cannot achieve the goal of "Rollover Prevention."

Ford agrees with the agency, however, that different vehicle configurations will have different rollover resistances, at least under some circumstances. Ford agrees that the vehicle dimensions, including center of gravity height and track width, play a secondary role in vehicle rollover resistance.

As the agency and others have consistently concluded over nearly 30 years of examination of this issue, light trucks including vans, pick-up trucks and SUVs will have, in some circumstances, less rollover resistance than general-purpose passenger cars. The basic debate on the subject for decades has not been directed at denying the soundness of that principle, but rather has been directed to the fact that non-vehicle factors predominate as the cause of crashes and that there are wide variations in the rate at which rollover crashes occur among vehicles within a given class or category. The fundamental issue is that this variation within a class of vehicles exceeds that which exists between classes of vehicles so that a reasonable prediction of the rollover rate of a given vehicle based only on its SSF is not possible.

The agency's analysis method which calculates the portion of crashes that are rollovers is, of course, one that emphasizes vehicle characteristics while ignoring the reasons why a vehicle is in a crash initially. It thereby fails to account for those driver and environmental factors, which predominate as crash causes. For example, in the agency's notice, Figure A-1 portrays data for "Rollovers Per Single-Vehicle Crash" by SSF for a number of vehicles. Accepting those data at face value for purposes of this discussion, it can easily be seen that within the range of SSF between 1.05 and 1.12, a proposed two star vehicle, the highest rollover rate is nearly three times greater than the lowest rollover rate. Vehicles with an SSF between 1.13 and 1.24 would receive three stars even though the average rollover rate for two stars is only 1.5 times larger than the average rollover rate for three stars. From those data, the variation within the two star group is 300% and the variation from the two star group to the three star group is 50%. This means that a consumer would be misled and misinformed if the added star was intended to describe a lower risk among the vehicles that would be rated three stars. Many individual vehicles that would receive three stars under the agency's proposal have a higher real-world rollover rate than vehicles that would receive two stars.

Even in the simplified analysis above, such information based on SSF would not "enable prospective purchasers to make choices about new vehicles based on differences in rollover risks..." and it would be misleading. Ford believes, as it has stated in nearly 30 years of responses to inquiries on this subject that this problem arises because rollovers are better explained by driver and environmental factors than vehicle characteristics. Further, Ford believes and the agency itself has confirmed that the principal causes of rollovers are driver and environmental factors that overwhelm the differences that exist among vehicle classes or categories.

An Alternative Proposal

Ford suggests that these problems can be overcome and that the agency's objectives can still be achieved if a metric is chosen to appropriately describe vehicle classes or categories rather than attempting to quantify a rollover risk. Ford believes that the magnitude of a given vehicle's SSF arises from choices made by designers to allow a vehicle to perform a given mission. A van capable of carrying substantial cargo or 15 passengers will, by necessity, have a configuration different than a passenger sedan such as a Ford Taurus and, as a result, its SSF will be lower than that of the Taurus. Our analysis of vehicles and their corresponding SSF's concludes that vehicles, regardless of their make, have dimensions used to calculate SSF's that fall within predictable ranges and therefore, SSF can be used as a surrogate to describe a vehicle's basic mission and classification. Ford believes that the use of SSF in this context can be helpful and can be a useful comparator to assist consumers in highlighting the vehicle's mission and the necessary tradeoffs in design that influence rollover resistance in a generic sense. When SSF's are accepted in such a context as a surrogate for vehicle type with a general correspondence to resistance to rollover, rather than as an objective measure of rollover risk, consumers receive accurate and useful information.

A Modified Star Rating System

Ford suggests that vehicle classes or categories can be accurately described by a star rating system such as the one listed below:

*	Light trucks with high off-road capacity, large cargo capacity and/or large passenger carrying capacity
**	Multi-purpose light trucks
***	General-purpose light trucks and passenger cars
****	General-purpose passenger cars
*****	High performance sports cars

It is our experience that vehicles that fall within the category described above for one star generally have SSF's that are 1.05 or lower. Those that fall within the category for two stars generally, have a SSF between 1.05 and 1.2. Those with three stars generally have a SSF between 1.2 and 1.3, those with four stars between 1.3 and 1.5 and those with five stars typically have a SSF of 1.5 or greater. We ask that the agency consider adoption of a star system where the meaning of the stars arises from a vehicle class or category rather than the proposed statistical analysis.

Descriptive language should accompany the star ratings to advise consumers that as the number of stars increases, it is likely that the rollover resistance of vehicles within the class would increase. Consumers also should be advised, consistent with previous agency analysis that vehicles, including light trucks and passenger cars, fall within a range of stars and that their utility or purpose and their corresponding designs can generally be correlated to their resistance to rollover. Consumers would still need to be informed that the number of stars cannot predict the risk that a given vehicle's occupants may become involved in a rollover crash because factors, such as driver behavior and the environment in which the vehicle is operated, can have greater influence than vehicle dimensions on whether one is involved in a rollover.

This system would provide consumers with accurate and useful information because they would be reminded that different vehicle classes or categories could have differing amounts of rollover resistance. Second, they would be reminded that the driver's behavior and the environment in which the vehicle is operated plays an essential role in determining real-world risks of crash involvement. Third, in line with the agency's stated objectives, manufacturers of motor vehicles would have an incentive to cause vehicles designed to have a specific use to have the highest feasible star rating. This system would not eliminate vehicle classes or categories that have legitimate uses but rather it would help clarify for consumers the manufacturers' intended use for a given product. It would also help keep a focus on all factors which influence rollover crashes in the hope that such a focus could help further reduce the incidences of rollover crashes.

Ford's Actions to Improve Motor Vehicle Safety

Ford shares the agency's view that motor vehicle safety is an essential priority and that efforts to further reduce crash involvement rates and injury rates, including those that arise in rollover crashes should continue. Even though the rate at which injuries are occurring in motor vehicle crashes, including rollover crashes, is at an all time low, we strive to continually reduce even that risk through broad based efforts. Ford continues to believe that its existing methodologies for proving its vehicle designs using various dynamic vehicle tests, CAE modeling and analytical work and other methods are sound. These methods contain a thorough set of proving ground tests, which include lane changes, slalom events, a handling course circuit, various understeer tests, braking tests and steering evaluations, all performed at various speeds and vehicle loading conditions using skilled evaluators. These procedures ensure that Ford's vehicles have appropriate steering and handling characteristics and a high capacity and margin of safety in terms of resistance to rollover. This does not mean that under some very severe conditions, any light truck or passenger car could not be made to overturn. Ford's design and development processes assure that Ford vehicles are designed to be safe if used in a reasonable way and consistent with their purpose.

Ford's efforts to continually reduce the risk of injuries to consumers in rollover crashes, in the context of this proposal, fall into three general categories; crash avoidance, rollover resistance and crashworthiness. In the area of crash avoidance, there are a variety of emerging technologies being pursued by Ford that we believe will further improve motor vehicle safety and further reduce risk of rollover. Among these are active computer aided vehicle handling systems that may help further reduce vehicle loss of control events and subsequent rollover events.

In the area of rollover resistance, Ford is continuing its efforts to make its vehicles compatible with how owners use them. We believe that consumers have needs for vehicles that have high ground clearance, a large cargo space and large passenger carrying capacities and our current plans are to continue production of such vehicles because we believe they are safe, they are capable of being driven safely and because they satisfy a legitimate need.

In the area of crashworthiness, Ford is pursuing such helpful technologies as side airbags, inflatable side curtains and safety belt reminder systems that can further reduce the risk of ejection, which is clearly involved in the risk of injury in certain crashes including rollovers.

Finally, it is likely that consumer information initiatives aimed at reducing rollover events and injuries will need to be multifaceted. The proposed star rating system is one approach. Ford has several other consumer information initiatives underway aimed at increasing belt use and raising the general awareness that all vehicles do not handle in the same fashion. Additional information about Ford's extensive efforts to further improve motor vehicle safety is contained in Attachment 1.

Conclusion

We continue to believe that there are numerous technical flaws that underlie the agency's specific proposed use of SSF to represent a numerical rollover risk. These issues are addressed in detail in the AAM submission. While we support the agency's efforts to address this important safety issue, we strongly believe that the proposal to quantify rollover risk based on SSF cannot be used as a proper basis for a consumer information program. We do believe, however, that the laudable goals of the agency can be realized by maintaining the basic framework proposed by the agency and modifying the star rating system along the lines we outlined above. We ask you to consider our proposal as a good faith attempt to work with you to reach a consensus on an important safety issue. We recognize that additional work is necessary to develop the message that will accompany the star ratings based on vehicle classifications. We would be pleased to meet with you to discuss the details of our proposal, answer your questions and work together with you on the alternative proposal and to address any issues you may have regarding it.

Sincerely,

L. W. Camp
Automotive Safety Office Director
Ford Motor Company

cc: Mr. Stephen R. Kratzke
Docket Management, PL-401

Attachment 1

Ford Rollover Safety Product Initiatives

Ford's approach to rollover safety includes both passive and active safety systems, as we do not believe that any one metric can fully quantify rollover safety. We choose to address the broader perspective that better technologies for vehicle stability and occupant protection help to provide improved overall vehicle rollover safety.

Active Yaw Control (AYC)

Recently, Ford announced that it plans to put AYC Systems (also known as AdvanceTrac) on many of our SUVs and pick-up trucks starting next fall with the 2002 Ford Explorer and Mercury Mountaineer.

AYC Systems are designed to help improve the directional response of vehicles in critical driving situations, such as panic/evasive maneuvers, adverse road conditions and limit handling. One of the main AYC system objectives is to maximize levels of driver controllability and vehicle stability during these critical evasive maneuvers.

The AYC system determines the driver's intended steering wheel turning rate by monitoring the vehicle's speed and steering wheel position. This intended turning rate is then compared to a measurement of the actual turning rate (yaw rate) of the vehicle. If the vehicle is turning significantly faster or slower than the driver's intended turning rate, which can happen during oversteer (which can lead to spin out) and understeer (which can lead to slide out) situations respectively, the system responds by applying brake pressure at the appropriate wheels or adjusts the engine torque to help match the intended and actual turning rates.

Additionally, the system monitors the side skid tendency of the vehicle by measuring the actual turning rate, lateral acceleration and longitudinal speed of the vehicle. If a side skid tendency is detected, the system will make the required adjustments in individual wheel brake pressures and engine torque to reduce the side skid tendency. In either the case of adjusting the turning rate or detecting the side skid tendency, AYC is capable of making the appropriate corrective adjustments regardless of whether the driver is braking, coasting, or accelerating.

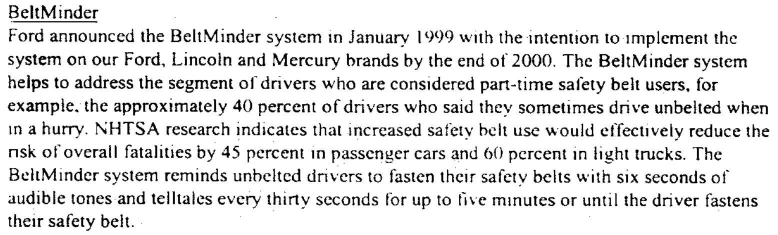
It is these capabilities of the AYC system, which help improve the driver controllability and vehicle stability, especially during critical driving situations. Ford intends to introduce the AYC system so as to help reduce the probability of both road departure and excessive side skidding, each of which are widely accepted to be significant determining factors in the roll outcome of an actual or potential crash.

Rollover Occupant Protection System

Earlier this year, Ford was the first to announce a rollover occupant protection strategy (also known as the Safety Canopy system), which we intend to implement starting next fall with the 2002 Ford Explorer and Mercury Mountaineer.

The rollover occupant protection system includes side air curtains, belt pretentioners and a unique rollover sensor. The rollover sensor is packaged within the Restraints Control Module located on the center tunnel between the driver and front seat passenger. The rollover sensing technology uses a roll-rate sensor and an algorithm, which compares the vehicle's angular velocity to a vehicle specific rollover threshold. If the threshold is reached, the rollover sensor signals the deployment of the occupant protection devices (side air curtain and front seat safety belt pretensioners).

The side air curtain is designed for improved protection in rollover events by extending bag inflation time. Through the use of new proprietary cool-gas inflator technology and low porous bag materials, the side air curtain remains inflated up to six seconds in longer rollover events. This helps protect the occupant from injuries caused by ejection or head contact as a result of moving through the plane of the side window.



BeltMinder

Ford announced the BeltMinder system in January 1999 with the intention to implement the system on our Ford, Lincoln and Mercury brands by the end of 2000. The BeltMinder system helps to address the segment of drivers who are considered part-time safety belt users, for example, the approximately 40 percent of drivers who said they sometimes drive unbelted when in a hurry. NHTSA research indicates that increased safety belt use would effectively reduce the risk of overall fatalities by 45 percent in passenger cars and 60 percent in light trucks. The BeltMinder system reminds unbelted drivers to fasten their safety belts with six seconds of audible tones and telltales every thirty seconds for up to five minutes or until the driver fastens their safety belt.

Mr. MARKEY. Thank you.

Now, what is again difficult for me to understand is the situation in Saudi Arabia not being seen by your company as being kind of equivalent to conditions in Nevada or other states that are in the deep southern part of our country in terms of climate. You indicate that you did request an additional study to be done by Firestone in that area. The conclusions which were reached in your opinion indicate that Firestone basically said there is no problem in the United States. What would be helpful for us to understand then is what it was that was unique in Saudi Arabia that they identified and explained to you that was different from the conditions in Nevada, for example, in terms of the wear and tear on tires that were causing those accidents.

Mr. NASSER. I think in Saudi Arabia there are a couple of things. Probably the major difference was the repairability of the Firestone tire in the Saudi Arabian conditions and the fact that people deflated and inflated tires very frequently for off-road use.

When we went to the Southwest of the U.S. to do a more in-depth study that we did jointly, it was pretty clear that we couldn't see any defects at that point.

After hearing the testimony from Firestone this evening, it is very clear that we weren't looking at the claims data. And on the recall tires, we did not see that claims data until late in July.

Mr. MARKEY. There has been a claim that Ford engineers advised underinflating Explorer tires to reduce rollover risk even though underinflating tires increases the risk of thread separation. Is that true?

Mr. NASSER. It is not. The tire pressure rating on the Explorer was specified and well known right from the start. It was meant to get the best ride and handling and derivatively, and there are many vehicles on the road today at 26 psi, and I think you have heard from Firestone very clearly that it is a red herring. It is not an issue. This is a tire issue, not a vehicle issue.

Mr. MARKEY. Are there documents at the Ford Motor Company that indicate this tradeoff between tire inflation and rollover risk?

Mr. NASSER. When vehicles are being developed, prior to the production of a vehicle there are many tradeoffs that happen. So I am sure the highly trained Ford engineers when they were developing the Explorer over 10 years ago looked at various tire pressures, shock absorber, damping ratings, different suspension systems, different handling, different steering. That is part of the development.

Mr. MARKEY. Can you provide for the subcommittee documents in your possession at Ford Motor Company that relate to this question which engineers had to consider at your company between the risk, the tradeoff between tire inflation versus the rollover risk, could you provide those documents to us?

Mr. NASSER. We would be pleased to do that and we would be pleased to bring the engineers that worked on the original Explorer back in to talk to the committee and explain exactly how vehicles are developed because it is an extremely complicated process.

Mr. MARKEY. Thank you, Mr. Chairman.

Mr. TAUZIN. Thank you, Mr. Markey. The Chair recognizes the chairman of the O&I Subcommittee, Mr. Upton.

Mr. UPTON. Thank you, Mr. Chairman. Mr. Nasser, a couple of times this evening you indicated that perhaps you wished we had the hindsight to ask the right questions or at least get the right answers when the questions were asked.

Going back to the questions that Mr. Tauzin asked with regard to the tests on the tires, anyone who looks at the documentation given to us, maybe 26 psi, but certainly the heat, you look at the southern states, you look at the heat and you look at the speed of these tires as well, you indicated that the tests that you asked for and in fact were at 26 psi, 100 miles an hour for 200 miles, did you ask for those tests in the heat, in the California, Texas, Arizona type setting as well?

Mr. NASSER. Those tests are done at various road conditions and various temperature conditions.

Mr. UPTON. So you will be able to share that data with us?

Mr. NASSER. Yes.

Mr. UPTON. Second, you don't look just at brand new tires off the rack, do you look at tires that have experienced 10, 20, 30, maybe even 40,000 miles as well?

Mr. NASSER. We look at wear characteristics and we specify wear characteristics, and we look at how the tire performs over the life of the tire. And of course the life of a tire has changed dramatically, as many people have mentioned here. It used to be 20, 30,000 miles maximum. Now we are talking about 60, 80,000 miles. So the whole environment of the lifetime of the tire has also changed dramatically.

Mr. UPTON. In your written testimony, and you will recall me repeating this earlier this evening, but in your written testimony you indicated that it has been the standard practice in the automotive industry that tires are the only part of the vehicle not warranted. They are the only part for which manufacturers do not receive field performance data at Ford. This will change. How quickly will it change? You heard Firestone earlier this evening indicate that they will comply with your request. Has it been difficult getting them to move?

Mr. NASSER. In the past, and it goes back to the Motor Vehicle Act of the late sixties so it is a 30-year-old act, vehicles were under one act and one warranty and tires were under another. And I think many things have changed since then. We have seen tires that last longer, vehicles that have versatile and flexible capability on road, off road. We have a whole variety of hybrid vehicles and we now have a global economy. I think it is time that the tire manufacturers, the safety agencies and the automotive manufacturers came together and we shared that data. We shared quality and we shared customer input. We plan to initiate that in terms of real world data feedback as quickly as we can. We have started with Firestone and I have talked to the other tire companies also.

Mr. UPTON. Are you satisfied that Firestone has shared with you the information that you are going to make public in the future?

Mr. NASSER. I am not sure, to be quite honest.

Mr. UPTON. Have you talked with other members of the alliance, GM, Chrysler, others, about requesting the same information from their tire——

Mr. NASSER. I have not done that. But clearly for it to be effective we need it on an industry basis and probably on a global basis. I know the tire companies in the North Atlantic Global Forum have started a dialog on tire standards that would be at least for Europe and the U.S.

Mr. UPTON. Have Ford engineers looked at defective tires?

Mr. NASSER. We have. We have brought back something like 300 tires and we are doing our own analysis. We cut up the tires and tried to analyze them and tried to understand them. We are not tire experts, so we have brought in outside experts to help us and we are also working with Firestone. So we are doing it independently. We are doing it with outside experts and we are doing it together with Firestone.

Mr. UPTON. I talked to one of my dealerships today and one of them indicated that they had received yesterday literally a shipment of hundreds of tires to be used for customers that wanted to replace their Firestone tires and these tires that came in were a competing brand. As I recall, I think they were General tires. Yet they were not sure whether the warranty information or the arrangement that could be made in fact could use these specific tires and they were waiting to hear from Ford, even though they delivered them, whether or not they wanted—they wanted a clarification whether or not they could use another brand, another manufacturer's tire. Do you know the answer to that question?

Mr. NASSER. Other brands are suitable and we have agreed to 34 different types of tires that can substitute for the Firestone tire. They do include General tires. They include Michelin tires, Goodyear tires. They include a whole broad array of tires.

Mr. UPTON. Thank you, Mr. Chairman.

Mr. TAUZIN. The gentleman's time has expired. The Chair recognizes the ranking minority member of the full committee, Mr. Dingell, from Michigan.

Mr. DINGELL. Mr. Chairman, thank you.

Mr. Nasser, I have here a Ford warranty book on the Explorer, and in it it says as follows: Authorized Ford Motor Company dealers will repair, replace or adjust all parts on your vehicles except tires that are defective in factory supplied materials or workmanship for 3 years or 36,000 miles, whichever occurs first.

Then I read in the Firestone book here this language. It tells me if I have a tire problem I should, "see my Firestone retailer listed in the yellow pages under the tire dealers retail."

Now, I think this tells me two things. One, Ford provides the warranties on all parts of a new car or truck except tires; is that correct?

Mr. NASSER. That is correct.

Mr. DINGELL. And the tire warranty on a new car is provided by whatever company made the tire; is that correct?

Mr. NASSER. That is also correct.

Mr. DINGELL. Is this a standard industry practice?

Mr. NASSER. As far as we know all major manufacturers around the world have a similar process.

Mr. DINGELL. Manufacturers of autos and tires have the same practice. So it is a standard industry practice?

Mr. NASSER. Yes.

Mr. DINGELL. So when consumers have a problem with a tire on a new Ford vehicle, they go to the tire company; is that right?

Mr. NASSER. That's correct.

Mr. DINGELL. They don't take these problems to the Ford dealers?

Mr. NASSER. That's correct.

Mr. DINGELL. If Firestone is having a large number of their tires returned off Ford vehicles, Firestone will be hearing about them from their dealers; is that right?

Mr. NASSER. That is what happens.

Mr. DINGELL. But Ford will not hear about it unless Firestone tells Ford; is that correct?

Mr. NASSER. That is normally right. We sometimes hear about it through a hotline, as the chairman indicated. But I would say the majority of feedback from customers would go through the tire dealer.

Mr. DINGELL. Does Firestone give you periodic reports about how their tires are performing? Do they give you periodic adjustment rate reports and the like? Do other tire manufacturers give you such information?

Mr. NASSER. Historically Firestone from time to time, as they mentioned, share the warranty or what they call adjustment claims with us.

Mr. DINGELL. From time to time, what does that mean?

Mr. NASSER. Probably once a year or less.

Mr. DINGELL. On a regular basis?

Mr. NASSER. Not on a regular basis. And the claims data that we finally pulled out of the system so we could analyze it, the data that we had been asking for for months, that data has never been shared with any of the manufacturers, as far as we know.

Mr. DINGELL. Now, to your knowledge do tire manufacturers provide that source—you have just answered that question.

So under the current procedure Ford would not know about high adjustment rates on tires unless you know about it from some other source; is that correct?

Mr. NASSER. That's probably true.

Mr. DINGELL. And that is probably true throughout the industry?

Mr. NASSER. We believe so.

Mr. DINGELL. Can you tell us why this system is set up this way? Why don't you get regular performance information from the manufacturers on how tires are doing, doing these things on these vehicles?

Mr. NASSER. That really goes to the heart of the proposal of our early warning system because I think that really must include regular information, real world information coming in from the field on how every tire is performing, and it can't be just the warranty data. It can't be just the police data. It can't be just the personal injury or vehicle damage data or the hotline to the safety agency. It really has to be all of those coming in together so that we get a 360 degree view the way a customer would look at it for tire performance.

Mr. DINGELL. When you began your designing of the Explorer, you gave to the tire manufacturers the specifications for that particular vehicle and the specifications for the tire; is that correct?

Mr. NASSER. That is correct.

Mr. DINGELL. Those specifications you gave on the tire were essentially performance specifications as opposed to design specifications, were they not?

Mr. NASSER. That is also true.

Mr. DINGELL. Have you ever given or has anybody in the industry ever given design specifications to a tire manufacturer?

Mr. NASSER. I don't believe so. The tire manufacturers consider that proprietary information. They guard that jealously within each of the brands, and the industry practice is to set a standard in terms of speed, durability, ride and handling, and then on a periodic basis have quality input.

Mr. DINGELL. So Ford leaves to the manufacturer of the tire the design of the tire to meet particular sets of specifications; is that correct?

Mr. NASSER. Yes, it does.

Mr. DINGELL. Bottom line, tire manufacturers have complete control and responsibilities for the design, construction, composition and workmanship and materials used for the tires manufactured?

Mr. TAUZIN. The gentleman's time has expired.

Mr. NASSER. They are the experts.

Mr. DINGELL. I thank you, Mr. Chairman.

Mr. TAUZIN. Thank you. The Chair now recognizes the gentleman from Ohio, Dr. Ganske.

Mr. GANSKE. Thank you for the late hour, Mr. Nasser.

Earlier when I had a chance to question Mr. Ono from Bridgestone, we talked a little bit about the difference in tire failure rates at different plants and it looks like the Decatur plant has a high level but when I look over at that data it also looks to me like the rates for a couple of the other plants are higher than it should be. And there is a dispute, I think it is fair to say, that were the tires flawed or were they underinflated.

It seems to me that we have heard when tires are run at low pressures it causes excess heat which can damage the tires and heavier models such as a sport utility vehicle generally needs more pressure than a lighter one. Why on a vehicle most like the Explorer, the Ford Ranger pickup, built on the same frame using the same tires, Ford recommends a higher pressure?

Mr. NASSER. We have different tire pressures for different tire sizes and different vehicles.

Mr. GANSKE. These are the same tires.

Mr. NASSER. Tire pressures vary by vehicle depending upon the optimal level of ride and handling for those vehicles.

I have got to say, Congressman, that I think it became pretty clear from the Firestone testimony today that 26 psi is okay. It is an appropriate tire pressure. You heard it from Firestone. We went through how many competitive vehicles have 26 psi. Toyotas, Nissans, other products. We have 3 million Goodyear tires on Explorers at 26 psi. No problems. So I don't know why we keep going back to the tire pressure issue. We are confusing the public. We are not getting to the root cause, and the more we talk about the tire pressure issue, the less time we are going to have on concentrating on what the real issue is for our customers.

Mr. GANSKE. Excuse me, but it seems to me that there has been ample testimony today that the tire failures have occurred in places where it is hotter, that—do you dispute the fact that a tire at a lower pressure heats up more than a tire at a higher pressure?

Mr. NASSER. Of course it is a variable. But the tire pressures we were talking about, we are talking about 10, 12, 15 psi, not 26.

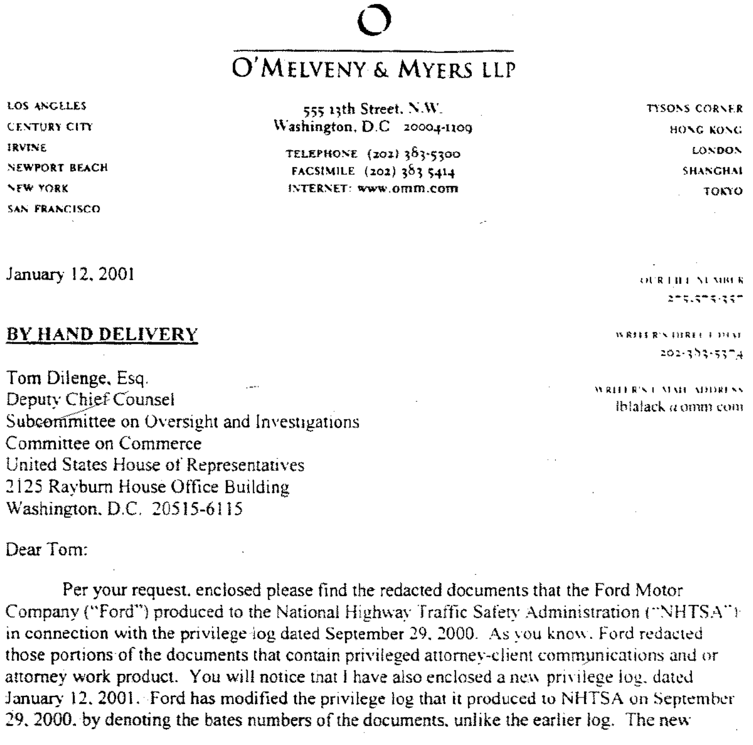
Mr. GANSKE. Do you have a number of these tires that have been recalled?

Mr. NASSER. We do. We have brought back about 300 of them. We are looking at them. We have independent bodies looking at them as well.

Mr. GANSKE. What kind of independent bodies do you have?

Mr. NASSER. These are tire experts. We will share that with the committee.

[The following was received for the record:]



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Dear Tom:

Per your request, enclosed please find the redacted documents that the Ford Motor Company ("Ford") produced to the National Highway Traffic Safety Administration ("NHTSA") in connection with the privilege log dated September 29, 2000. As you know, Ford redacted those portions of the documents that contain privileged attorney-client communications and/or attorney work product. You will notice that I have also enclosed a new privilege log, dated January 12, 2001. Ford has modified the privilege log that it produced to NHTSA on September 29, 2000, by denoting the bates numbers of the documents, unlike the earlier log. The new privilege log also identifies several documents from the earlier log which Ford has produced to NHTSA in unredacted form. In all other respects, the enclosed privilege log is the same as the earlier log provided to NHTSA on September 29, 2000.

In addition, I have enclosed for your review the two settlement agreements that Ford previously produced to the Subcommittee on Oversight and Investigations and the Subcommittee on Telecommunications, Trade and Consumer Protection ("Subcommittees"). As I noted in my letter to Chairmen Tauzin and Upton, dated November 7, 2000, these settlement agreements were inadvertently omitted from Ford's production of similar settlement agreements on September 15, 2000. In order to facilitate your effort to close the hearing record, I have enclosed a second copy of the letter setting forth Ford's position on NHTSA's proposed rollover ratings and prevention initiative. As you know, the letter is responsive to Congressman Markey's request that Ford submit a written statement of its position on the proposed rollover ratings system.

Because some of these documents contain proprietary information of the Ford Motor Company, we ask that they be treated as confidential. Indeed, my client submitted many of these same documents to NHTSA requesting that they be given confidential treatment. We ask that the Subcommittees afford these documents similar confidential protection. Should the Subcommittees wish to publicly release any of these confidential documents, Ford respectfully requests reasonable notice and the opportunity to object to such a release.

You also asked that Ford identify the names of the outside entities that are conducting testing of the Firestone tires for purposes of determining a potential root cause. It is my understanding that the consultants and laboratories that have performed root cause testing are as follows:

- Akron Rubber Development Laboratory, Inc.
- Smithers Scientific Services, Inc.
- Standards Testing Laboratories
- Axel Products

Should the Subcommittees have any questions regarding these documents or this matter generally, please contact me at your earliest convenience.

Very truly yours,

K. Lee Blalack, II
for O'MELVENY & MYERS LLP

Enclosures

Edith Holiman, Esq. (via facsimile w/o enclosure)
Counsel to the Minority, Subcommittee on
Oversight and Investigations
Robert T. Biskup, Esq. (via facsimile w/o enclosure)
Assistant General Counsel, Ford Motor Company
John H. Beisner, Esq. (via facsimile w/o enclosure)

Mr. GANSKE. You selected them?

Mr. NASSER. Yes.

Mr. GANSKE. Did you have input from NHTSA when they looked at the tires?

Mr. NASSER. There are not that many around the world. I am sure between NHTSA and Ford and Firestone, we have them all tied up at the moment.

Mr. GANSKE. How are you determining which tires you look at?

Mr. NASSER. Randomly, and we have concentrated on some of the higher mileage tires as well and some of the high temperature.

Mr. GANSKE. We had testimony earlier from NHTSA that they want to do their own testing.

Mr. NASSER. They should.

Mr. GANSKE. Have they contacted you yet for random samples of those tires?

Mr. NASSER. I am not aware of that. Normally the tires are going back to Firestone. We are getting some of those tires back because we would like to do our own testing as well.

Mr. GANSKE. So you have initiated those tests?

Mr. NASSER. We have.

Mr. GANSKE. What have you found so far?

Mr. NASSER. We have not reached any conclusion so far. We have just started.

Mr. GANSKE. Congressman Tauzin mentioned some memos from the Middle East where people have problems coming in over a line that was set up for complaints. On May 12, 1999, Ford issued a notice to all Ford dealers in the Middle East that directed them to inspect the tires of all SUVs every time a vehicle is brought into the dealership for any type of service. That memo was written several months before Ford recalled the tires in August 1999, and a copy is in tab 43. Was this memo directing dealers in the Middle East to inspect the tires of every SUV that came into the dealership for service Ford's first official response to the tire problem?

Mr. NASSER. Congressman, it was during the period where we were trying to understand exactly what the problem was.

Mr. GANSKE. Why didn't you at that time if you directed all of your dealers to be inspecting all of these tires, knowing that there seemed to be some problem, why didn't you send out a letter to all SUV owners with those kinds of tires at that time?

Mr. NASSER. We were asking Firestone because in the U.S. Firestone warrants the tires. In the Middle East market, where there really isn't a very good network of customer feedback, we were going to our dealers to get them to help us get Firestone data. That was the difference. That is the only difference between the two.

Mr. TAUZIN. The gentleman's time has expired. The Chair——

Mr. GANSKE. 30 additional seconds.

Mr. TAUZIN. Without objection, proceed.

Mr. GANSKE. But you are telling your dealers to look at those tires that come in in May and, yes, it may be difficult to track down every one in the Middle East that has bought one, but you have dealers and they are servicing vehicles. Why not make an effort at that time for those people in that area to notify them that there is a problem if you are instructing your dealers that there is a problem?

Mr. NASSER. Because at that point, and that was just a couple of months before we really gave up with Firestone and went with Goodyear, we were trying to understand exactly what the problem was.

Mr. TAUZIN. The gentleman's time has expired.

Mr. GANSKE. I thank the chairman.

Mr. TAUZIN. The Chair recognizes Mr. Stupak for a round of questions.

Mr. STUPAK. Thank you. Mr. Nasser, would you and Ford join with me in calling for and cooperating with an independent panel to review the AT, the ATX and the Wilderness tires to determine the cause and proposed solutions?

Mr. NASSER. We would welcome that.

Mr. STUPAK. Okay. In documents, and I am looking at document number 32 in the books there, it says Explorer tire DNP. What does DNP mean?

Mr. NASSER. Dealer notification or something. I am not sure. We have so many acronyms at Ford I don't think that anyone really understands any of them. ONP?

Mr. STUPAK. DNP, D as in "dog."

Mr. NASSER. We will send you a notification of that following the meeting.

Mr. STUPAK. My question is this. In there it says, and this is Ford in Venezuela actions. It says to align with JCC, DNP and to improve Explorer market image, FOV, Ford of Venezuela, introduced the same GCC Goodyear tire for all new Explorers beginning in July 1999. I take it starting in July 1999 all Ford Explorers in Venezuela had Goodyear tires as opposed to Firestone tires?

Mr. NASSER. That is when we started the replacement program in Venezuela.

Mr. STUPAK. Okay.

Mr. NASSER. What we tried to do in Venezuela, and Venezuela in this situation is a mess because you have got, as you heard, mislabeled tires, 15-inch tires, 16-inch tires, local tires, imported tires, a data base in terms of accidents and incidents that is very primitive.

Mr. STUPAK. So any Explorer sold in Venezuela starting in July 1999 came with Goodyear Wranglers on; is that correct?

Mr. NASSER. That's correct.

Mr. STUPAK. But you didn't recall the tires on vehicles already sold until May of 2000. Why did you wait 8 months to recall the other tires if it is such a mess in Venezuela?

Mr. NASSER. Because we understood that there were some issues, but we didn't really know the magnitude of them, and we wanted to at least put a stop to building any more future potential problems. So we moved quickly as we had done in the Middle East to do that.

Mr. STUPAK. But I guess I am looking at your—again your Explorer tire DNP, and it indicates from several newspaper clippings at least 60 cases have been identified. The issue has a high fatality rate. Ford of Venezuela will initiate a joint investigation with local and U.S.-based Firestone technical personnel. I guess the part that bothers me, July 1999 you stop Firestone and go to Goodyear, but you waited until almost May of 2000 to recall the ones already out there?

Mr. NASSER. Yes, and we did that 5 months before Firestone and the government got involved. We did that on a voluntary basis.

Mr. STUPAK. In the memo it says background since July 1997. Even at meetings in Caracas with a group of independent lawyers representing four customers.

Firestone continues to state there is no problem with the tire—with the——

Mr. NASSER. Are you talking about in the U.S. now?

Mr. STUPAK. Yes.

Mr. NASSER. I think Firestone clearly indicated that there is a problem with those tires that were included in the initial recall, and my impression is that they are looking at the additional tires that the safety agency here in the U.S., the additional 1.4 million tires, as a potential add to the original program.

Mr. STUPAK. Firestone states that underinflation, high speeds, things like that, is the cause of the problem with the tire. I think that is what we all got out of here.

Mr. NASSER. I didn't get that out of here, I'm sorry. What I got out of here is that they really weren't sure what the defect is, that it is very clear when you look at the population of tires that were built in the Decatur plant and those tires that were included in the original recall of August 8, manufacturing defects and other issues are——

Mr. STUPAK. Mr. Nasser, even in Venezuela, to go through your problem descriptions, underinflation, all of the same reasons. My point being this, in Venezuela, Saudi Arabia, you replaced both 15 and 16-inch tires?

Mr. NASSER. Uh-huh.

Mr. STUPAK. Why don't you do the same here in the United States? You did it in Taiwan and Malaysia, Venezuela and Saudi Arabia. Why do you do it differently here?

Mr. NASSER. Because the data doesn't support it. Are you data driven or not? The data doesn't support it. As soon as the data supports it, we volunteer it. We didn't wait. We didn't wait for Firestone or NHTSA or Congress. We didn't wait for anyone. We went ahead and did it.

Mr. STUPAK. What data supported replacing 16-inchers in Saudi Arabia, Venezuela, Malaysia and Taiwan? What data did you have then that would require you or have Ford recall the 16-inchers in these other countries and not here?

Mr. NASSER. In those countries we were getting anecdotal data because there isn't any formal data that there were issues on the Firestone tires. If I go to Venezuela, the day we announced the recall in Venezuela, the day we announced it, we went to NHTSA here in the U.S. and we informed them, we told them about the data.

Mr. STUPAK. What is the information, your data that would make you recall the 16-inchers in Venezuela, Saudi Arabia, Taiwan——

Mr. NASSER. Data that they were unhappy with Firestone tires.

Mr. STUPAK. So if the American public says we are unhappy with the 16-inch Firestone tire on our Ford Explorer, and I think it is standard on Eddie Bauer, you will replace them?

Mr. NASSER. Congressman, look at the data. That data represents customer input and that customer input is world class. If customers turn around——

Mr. STUPAK. The reason that we are here is because of consumer input to the U.S. Congress, and that is why the first day back we have been at this hearing now pretty close to 9 hours, I am sure that we will be here 12 hours. I think it is fair to say that consumers in the United States are not happy and certainly have lost some faith here in both Firestone and Ford about the whole tire thing. When they see 16-inch tires recalled in other countries, they are saying why not mine if they are the same tire?

Mr. TAUZIN. The gentleman's time has expired.

Mr. STUPAK. Thank you.

Mr. TAUZIN. Mr. Nasser, you may respond.

Mr. NASSER. We feel for our customers as much as you do. They are our customers. We have despaired when we can't get to the root cause. We went through and analyzed it so we can understand exactly what is going on in the U.S. We don't want to replace good tires with good tires. We want to replace bad tires with good tires and that is what we have done. If the data supports it, we will replace it.

Mr. TAUZIN. The gentleman from Tennessee, Mr. Bryant, is recognized.

Mr. STUPAK. Can you give us the data that would require the 16-inchers?

Mr. NASSER. The data is publicly available now.

Mr. STUPAK. Can you identify it?

Mr. NASSER. I have a chart on it.

Mr. STUPAK. Does that include Venezuela, Saudi Arabia? The answer is no. What is the data for those four countries, Malaysia, Saudi Arabia, Venezuela, Taiwan?

Mr. TAUZIN. The Chair requests that you supply that information to the committee and recognizes the gentleman from Tennessee, Mr. Bryant.

Mr. BRYANT. Thank you, Mr. Chairman.

Mr. Nasser, thank you for being here today. We have a lot of questions and obviously these are very important matters that we are discussing. I am a former owner of an Explorer for a couple of years back in the 1997-1998 timeframe and we were satisfied with the performance there. It was a leased vehicle, so I had to turn it back. You testified earlier today in the Senate?

Mr. NASSER. I did not.

Mr. BRYANT. Did a representative of Ford?

Mr. NASSER. Yes, we had Helen Petrauskas and Tom Baughman, who are sitting behind me.

Mr. BRYANT. The issue of low pressure does keep coming up, and that is a concern because of these piles of papers that we have reviewed and admittedly some of this comes from Venezuela and the Mideast. There are indications in there that the Ford dealerships were encouraging Ford owners to use the lower pressure, the 26 psi in their tires. It has been brought up today too in terms of the issue of stability and that knowing concern out there, does it provide better stability, and fishtailing is mentioned in one of the white papers, that people operate at a lower pressure because of the fishtailing effect sometimes. And we understand that operating at a lower pressure causes problems with the tread and the separation of tire, so there is a tension there and I think that is where some of us have been going just to make sure that we cover all of the bases. I think you have made certainly an effective presentation, but those are the kinds of gnawing issues that are still out there.

Would you care to comment in terms of those last remarks and maybe again try to ease some of our concerns about the low pressure issue?

Mr. NASSER. This is really a message to our customers all over the U.S.

The Explorer is an American classic. It is a family vehicle. It is a five star rated vehicle. It is one of the safest vehicles on the road. That is not just recent history. That is over a 10-year period. It is a vehicle that people depend on because it is versatile, because it is flexible, because it can do all of the things that they want to do in their life-style. And we are proud of it and there are almost 4 million Explorers on the road and people love them. Now let me get to the tire issue that you talked about.

We have 3 million Goodyear tires on Explorers that have been on the road for years. We don't know of any problems. We have competitive vehicles with very similar tires and 26 psi. We don't know of any problems. We saw that the defect pattern on the 15-inch tires from Firestone was very correlated, directly linked to certain plants and certain time periods.

So I step back from that and we are convinced that we have set the vehicle at the right level, handling, steering, stability. When you look at Explorer rollover, it is one of the best SUVs in terms of rollover protection. It is one of the best in terms of serious accidents. Now that didn't happen by chance. It happened because we have highly trained engineers and people within the company who care deeply about our customers.

So we are not having an esoteric argument here about pressure in tires. When people talk about low pressure in tires affecting stability, they are talking about people who bring the tire pressure down to 10, 12 psi, and then don't inflate it again at high speed.

And I think someone mentioned earlier that some communication on tire care is probably needed at this point because I believe most of us, most customers, take their tires for granted because generally they are so robust, they are so good, they are so strong in today's modern vehicle.

Mr. BRYANT. Given the excellent product that you have in the Explorer and the excellent performance and favorable rating over the years, can you not also give some credit to Firestone, who I assume has had a long-standing relationship with your company up until recently in terms of good tires?

Mr. NASSER. Firestone and Ford have had a tremendous relationship. It goes back from the start of both companies. And I have to say they have built millions of good tires and that relationship has been strong. We also have to say that recent events have been disappointing to us and I have said that we value our customers' security and safety and peace of mind above any other relationship that we have. So going forward, our relationship with Firestone, as it would be with any other supplier that let us down, is on a day-today basis.

Mr. TAUZIN. The gentleman's time has expired. Finish up with this question.

Mr. BRYANT. You had mentioned, I think, in your opening statement about the second thing that you want to bring out or maybe it was the first, somewhere along here, a tire pressure early warning system.

Mr. NASSER. I did not mention that, but I personally support that. I think that was something that was mentioned by the safety agency, Ms. Bailey, and we think if we can do it in a practical way where customers will really use it and they can easily monitor what the tire pressures are and they can adjust them easily, I think that would be a magnificent add in terms of peace of mind and safety.

Mr. BRYANT. I misread it in terms of the location. It was in the white paper that we reviewed, and I think you mentioned it in your testimony. It corroborates that there is a problem out there when you run these tires at pressure lower than recommended and this kind of problem can develop.

Mr. NASSER. That's correct.

Mr. BRYANT. And the early warning system would be a device that Ford would recommend which would prevent the situation of people running their tires at lower than recommended air pressure.

Mr. NASSER. We would.

Mr. TAUZIN. The gentleman's time has expired. The Chair recognizes the gentleman from Ohio, Mr. Sawyer.

By the way, the reason that I love my Explorer is because it is paid for.

Mr. NASSER. I will add that to my description next time I talk about it.

Mr. SAWYER. Thank you. We have covered so much ground today and I am grateful for your presence, Mr. Nasser. The issues we are talking about go back to the very beginning of the tire and automotive industries. The relationship in terms of warranties I suspect are deeply embedded in the culture of both industries, and probably go back to a time when tires were not as reliable as they are today.

Mr. NASSER. Exactly.

Mr. SAWYER. And it was an absolutely necessary financial relationship, one that was built on trust and confidence and has grown over the years. But that relationship has been built into law now and it was—you mentioned earlier that tires are no longer really separate in the design dimensions of a car. They are integrated into the suspension systems, the damping rates, the spring rates, and have really become—steering, and have become a functional part of the suspension as well as the drive train and other components.

Should we be thinking about more modern ways to integrate the design and the performance of tires into the performance of the vehicle itself? Should we revisit the National Traffic and Motor Vehicle Safety Act of 1966, which has built this separation into law, and should we look at new ways to integrate that performance?

Mr. NASSER. I can't think of many things that haven't changed since 1966, and particularly in this area where vehicle dynamics, steering, suspensions, just the overall personality and feel of the vehicle is now being—it is in the bloodstream of every part of a car or truck, and tires are becoming more and more a fundamental part of——

Mr. SAWYER. It is only through those four contact patches that in fact all of the design performance that you have built into your cars really gets carried out.

Mr. NASSER. That is correct. So we would support a review and we think that it should be a cross-industry review that includes not only the safety agencies and government, but also the tire companies and the automotive manufacturers.

Mr. SAWYER. You mentioned the Trans-Atlantic Business Dialogue and the kind of work that has gone on toward harmonization over the last decade. I asked the Firestone people earlier, would you support transparent reporting procedures to share information about vehicle and tire performance on a transnational basis?

Mr. NASSER. Ford Motor Company certainly would support that.

Mr. SAWYER. Let me finally close with a question that Mr. Bryant suggested. A number of tire companies have worked to build, particularly with regard to run plant technology, to build sensing systems so you would know when you were losing pressure. I spoke last week with an after-market provider of those kinds of systems. He says that he can provide in a way that is not very efficient after market sensing systems that will provide information not only on tire pressure but temperatures on a continuous basis. Is that the sort of thing that Ford would considering offering as an option on their vehicles?

Mr. NASSER. I think on certain product lines it would be a very popular option, but it needs to be friendly to the customers. It can't be a scientific device that is so difficult that you need a professor of engineering to figure out.

Mr. SAWYER. It needs to be easy to use and indicate by idiot lights on the dashboard when you have a problem, but the information would be useful?

Mr. NASSER. Very useful.

Mr. SAWYER. Let me close by saying that I am particularly interested in revisiting the question whether or not the separation of performance and design as it existed 44 years ago—34 years ago, really makes the kind of sense today that modern tire and automotive engineering technology makes possible. Thank you.

Mr. TAUZIN. I thank the gentleman. The Chair recognizes the gentleman from North Carolina, Mr. Burr.

Mr. BURR. Mr. Nasser, throughout this whole process has there ever been a point where Firestone has objected to doing anything that Ford has asked of them?

Mr. NASSER. I would say "objected" is probably a strong word, Congressman. But when we asked for the claims data, it isn't—it isn't usual business practice for someone like the Ford Motor Company to ask a supplier four times for data before we get an answer.

Mr. BURR. Was there ever a point either in Saudi Arabia or in Venezuela where Ford made a request of Firestone to do a recall and they objected?

Mr. NASSER. In both cases we decided to go alone because we couldn't get cooperation.

Mr. BURR. Was there a request of Firestone for them to either recall the tires or to participate in a recall that they objected to?

Mr. NASSER. In both cases we asked for assistance from Firestone, and I think you have heard the Firestone testimony where they said they declined to participate. And when they declined to participate, we didn't want to leave our customers on their own so we went ahead.

Mr. BURR. Is Ford concerned with any other tires specifically in Saudi Arabia on other Ford vehicles that there may be reports on now that are beginning to show the same tread separation, specifically Navigator and Expedition?

Mr. NASSER. I am not aware of any, but if we find any we will handle it in exactly the same way.

Mr. BURR. Let me suggest to you that tab 52, 53 and 55 are documents dated September 1999 which reflect the concerns that Ford is having with tread separation, problems with tires on Ford Expedition and Lincoln Navigator. They were directed to the Ford Customer Service, and I won't give their quote, but specifically they say we see a pattern began. To your knowledge there is nothing ongoing at Ford that is looking potentially at other tires on other Ford vehicles currently?

Mr. NASSER. I am not aware of any.

Mr. BURR. There was no notification by Ford to NHTSA of the possibility of additional vehicles and/or tires?

Mr. NASSER. Not that I'm aware of, and I don't think there are any other notifications going on.

Mr. BURR. Let me read one quote out of the document, and I quote, "We've already received complaints from customers regarding the tire burst on the 1999 model year Expedition. As you will agree, we cannot afford to take any chances concerning fatalities involved in the Explorer accident s and the negative word of mouth generated for this model. I would encourage you to check with your folks to look specifically at those memo s and to see if there's some action that you, as the head, need to look at."

Let me ask specifically, what's changed for Ford since the Texas television expose where Ford's comment was that they blamed driver record?

Mr. NASSER. You know, you go back to I think it was Channel 11; they deserve a medal actually because they did focus attention on this. In all of the times that we went back and asked, are there problems, it was always "no problems," "no problems"; and Channel 11 started everyone to think, well, wait a minute, maybe there really is something there; let's dig deeper, let's ask different questions, let's look at this from a different perspective.

So that was the start of a very different investigation. It had an impact on us. So I'm sure it had an impact on other people.

Mr. BURR. Let me ask you the last question that I hope you would expect to be asked this today. In your TV ad you were very specific from a standpoint of your family having three Ford Explorers. Do they currently have any recalled tires on them?

Mr. NASSER. No. They've got the 16-inch tires on them, and they have been, as the chairman indicated, faithful, wonderful vehicles for them.

Mr. BURR. If they had recalled tires, would you be anxious to change those?

Mr. NASSER. Yes, I would, and that's why we're working as hard as we can and talking to other companies beyond Firestone to get as many tires as quickly as possible.

Mr. BURR. Thank you for your honesty and also for your patience today, and I yield back.

Mr. TAUZIN. I thank the gentleman.

The Chair recognizes the gentleman from Illinois, Mr. Rush.

Mr. RUSH. Thank you, Mr. Chairman.

Thank you, Mr. Nasser, for your patience and for your veracity in terms of answering some of the questions that my colleagues raised.

Let me ask you about the warranty initiatives that you indicated in your earlier testimony that you feel will be a part of a new arrangement, a new agreement, where consumers would have the warranty on their tires as a part of their standard warranty package when they purchase new vehicles.

Can you tell me, is this a negotiating point now that you have with Firestone and other tire manufacturers in the Nation?

Mr. NASSER. Congressman, most tire manufacturers have a warranty, but it is a complicated warranty, and I heard you ask Firestone for their warranty and I heard them bumble through the answer. So I'm not going to be able to give you a better answer than that.

Many of the tire companies have a warranty that is really based on the number of miles that the tire has traveled. So it's a graduated warranty period. Some have been going up to 80,000 miles, but your reimbursement differs by how many miles you have traveled; and I think what we need here is a little more clarity to the consumer about exactly what the warranty conditions are.

So I support you fully. Consumers need to know exactly where they stand with warranty on an important component such as a tire.

Mr. RUSH. So, in other words, the future customer, Ford's future customer, will have two sets of warranties—would continue to have two sets of warranties, is that right, one for the tire and one for the other parts of—Ford parts. Is that right?

Mr. NASSER. That will continue to be the case unless we find that it is better for our customers to do something differently, and that's going to be part of the review that I think needs to happen going forward.

Mr. RUSH. Let me ask you this. You basically in your testimony have—if I interpret you correctly, you basically feel as though Ford has been somewhat of a victim here also, in terms of these tires that have been recalled and the fact that Ford customers have experienced injury—accidents, injury and even possibly deaths as a result of these faulty tires. Is that correct?

Mr. NASSER. Our customers have been the victim and that's why we're mad. That's why we're upset because our customers have borne the brunt of this, and we don't like it, because we love our customers and they love their Ford products. So when we're let down and we then let our customers down, we just don't like that.

Mr. RUSH. Mr. Nasser, in discussions that I had with some of the committee staff a few moments ago, I asked them about the last recall, massive recall in the Nation, and they informed me that they, in fact, had read this committee's transcripts of the recall that was conducted some 22 years ago.

My question is, what's different now 22 years later? What didn't we learn 22 years ago that we should have learned, that would have helped—prevented us from being at this point today? How was Ford affected by the recall some 22 years ago and where have we let the Nation down? Where has the Congress let the Nation down? Where have Ford and other automobile manufacturers let the Nation down, and certainly where has Firestone let the Nation down again 22 years later? And what's to give the consumers the confidence that down the line we won't have the same tragic occurrence and be right back here in this committee room again somewhere in the future? Can you answer?

Mr. NASSER. I think it's a very pertinent question, and it's one that we have obviously been asking ourselves time and time again, and the answer probably lies in how we look forward now at the changes that we have to make.

You know, history's important; you get good lessons from history. But we really now have to start to look forward and say, what do we need to do better, what do we need to do differently, how do we stop this from happening again. And I think the suggestions that I mentioned earlier are two steps that will help, that will help consumers, that will help make the communication of customer feedback on tires and vehicle quality more open so we cannot have this dialog 22 years from now.

So there are our two suggestions.

Mr. RUSH. Thank you, Mr. Chairman. I yield back.

Mr. TAUZIN. I thank the gentleman.

The Chair recognizes the gentleman from Illinois, Mr. Shimkus, for a round of questions.

Mr. SHIMKUS. Thank you, Mr. Chairman. And it's been a long day and we appreciate your attendance and your straight answers.

I think one of the things that many members are dealing with is—and you commended the Channel 11 story, and I think we did, too, for having that first airing. And as I've been trying to talk to the reporters from here and from at home, explaining the hearing, I've been using the terminology, you know, what Channel 11 did was, they connected the dots before Ford did, before Firestone did, before NHTSA did, before we all did. And one of the things we have to—in trying to identify the problem is then come up with solutions.

So as my colleague from Illinois—how do we get off this treadmill so we're not here again is, we need to address legislatively how are we one of the first ones; or how is industry partnership or a third-party group, how can we connect the dots. And I think you addressed that in your opening statement, but I wanted to also applaud Channel 11 for the work that they did in investigative reporting and stuff that we don't see, I don't think, too often today.

And one of the things that hasn't been addressed, but was addressed in this Time magazine article, is a debate—and I should ask if Firestone is still in the audience; I didn't ask them when the time was right—but a debate on the nylon cap issue, and whether the time that we have eased the speed limitations and the engineering and the tires along with all this and a need to rethink about going back to the nylon cap, which some of the Bridgestone tires of this size made in Japan still have.

My question to you, Mr. Nasser, in giving specifications to the manufacturer to produce a tire for the Explorer, did you consider returning to the nylon cap as part of the specifications?

Mr. NASSER. We don't specify a cap, an additional nylon cap or not. We specify standards that the tire has to meet, and to my knowledge, the tire industry in the U.S. does not have the nylon cap.

Interestingly enough, and I'll preface this by saying that I'm not a tire expert, but I believe that for many of the tire manufacturers their tires—the tires that they use in very arduous conditions in some of the developing countries of the world, they add the nylon cap as an added protection for puncture, not necessarily for speed or for durability, but just to make the tire more robust in terms of puncture capability, but I think that's a question that you should address to the tire industry.

Mr. SHIMKUS. And I'll—at the chairman's discretion, how best to do that, I'll leave that up to the chairman. I know we had talked about that.

Mr. TAUZIN. The record remains open. The gentleman can submit written questions, which we'll submit to Firestone. Be happy to do that for the gentleman.

Mr. SHIMKUS. Thank you, Mr. Chairman. And just to close out this point, when we talk about the Firestone 500 and the separation there, it's my understanding that the nylon cap was a solution to that problem, and when we had the lower speeds, it was determined that that was no longer the need. Now we're at some higher speeds with new vehicles. I think it's a point well taken.

I'd like to also offer you, as I did Mr. Ono, a chance to address some of the—your employees, some of them may be in my district. You have a St. Louis assembly plant. I'm right across the river. I'm sure there are a few employees that live in my district. Based upon your experience here today, the testimony, if you could send a message to them, what would you tell them?

Mr. NASSER. I think Ford employees all around the world and I'm sure in your district, Congressman, are devoted to customers. I mean, that's what runs through our bloodstream. It's in our DNA. It's what we think about all the time. And I'm sure they're disappointed when they hear about some of the allegations that are around Explorer, because Explorer, as I said before, has been just a wonderful vehicle, and we have two assembly plants in the U.S. that are devoted to Explorer. The work force in both plants are world class, the quality is top notch, and customer satisfaction is at very, very high levels; and I'm proud of them. I'm proud of the way they have reacted over the last several months. They have worked hard. They've been involved in retrieving tires. They've been involved in better understanding customer data, and I'll pass that message on to them from you.

Mr. SHIMKUS. I yield back, Mr. Chairman.

Mr. TAUZIN. I thank the gentleman.

The Chair recognizes the gentleman from Minnesota, Mr. Luther.

Mr. LUTHER. Thank you, Mr. Chairman.

And thank you, Mr. Nasser, for your testimony. There was some dialog earlier about how a company like yours does get information on problems like this, and I assume one of the ways that you do get information is through the claims that are brought, because—can I assume that in a lot of the claims—I haven't seen a chart for you, but in a lot of the claims here, you would be involved; in other words, the claim would be brought against Firestone and against you? That would be the case, wouldn't it?

Mr. NASSER. The claims that you see on that chart, as I understand it, are vehicle damage, property damage, personal injury.

Mr. LUTHER. Right.

Mr. NASSER. Damage claims. So we may see, going back to your description, Congressman, a dot here and there. We do not see those trends, and we don't see them—it wasn't until we asked for that data and we analyzed it by month, by plant of production, by type of tire, by type of vehicle that we cracked the code.

So getting a legal case here and there distresses us. We don't like that because it means a customer is unhappy, but it really doesn't give us data that we can work with. We're a data-driven company, and you can't react to here's a little issue here, here's another problem here. We want to get the data in a form that can be analyzed.

Mr. LUTHER. Okay.

You, I know, were here when you heard testimony about how the claims information was handled by Firestone. I believe you were here in the room.

Mr. NASSER. Yes.

Mr. LUTHER. How do you handle claims information? Is it similar to the way Firestone does?

Basically, as I heard them testify, they look at it from an accounting standpoint. It did not—it did not factor in safety and recalls and these kinds of decisions.

When you get claims information, how do you treat it? How do you deal with it within the company?

Mr. NASSER. The claims information we get are very minor, so we don't take any regard to the cost of that. What we want is all of the information coming in on total claims because that gives us a trend. We're interested in customer satisfaction and making sure that every one of our customers is delighted with their product. We don't drive the company by trying to analyze and manage claims data. We don't even get the claims data; Firestone gets the claims data.

Mr. LUTHER. Well, I assume that you would be involved in a number of the claims against Firestone. I mean, it would be very typical for a claim to be brought against both the manufacturer of the vehicle and the manufacturer of the tire.

Mr. NASSER. That's true.

Mr. LUTHER. And so at this time that you were making the diligent effort that you have referred to, to try to get to the bottom of this, did you in fact check with the people who were handling the claims who would have been privy to a considerable amount of claims information at that time, because already by 1996 and 1997 we're getting into the hundreds of claims, many of those would have of course involved you to some extent as well.

Did you make any inquiry or check into the people handling this for you?

Mr. NASSER. We looked at many of those claims, but we couldn't see any trend; and we went from there to the NHTSA safety agency data, and as you heard from Ms. Bailey, there wasn't anything there. We went back and asked Firestone one more time, give us some feedback. We couldn't find anything there, but our claims data is open. We don't close it. So anyone can look at it. We'll make it available to the committee. You can look at it. I don't think you will find anything there that would clearly indicate the problem prior to when we put it together.

Mr. TAUZIN. Mr. Luther, would the gentleman yield a second?

Mr. LUTHER. Certainly.

Mr. TAUZIN. I want to inform the gentleman that one of the requests we'll make upon Ford, and a very detailed request, is exactly for that, see if you did do any analysis of these lawsuits, whether they were related to something wrong with the vehicle or something wrong with the tires. It's rather hard for me to believe that somebody in your company wasn't doing that.

Mr. NASSER. We would be doing it.

Mr. TAUZIN. So we would request that you diligently search for any analysis or charts or research done on that single question, because that obviously is central to the question of whether or not you had notice of these tire defects.

Mr. LUTHER. Thank you, Mr. Chairman.

Can we assume then, along with that, similar to Firestone, that you would waive any confidentiality?

Mr. NASSER. Yes, we would.

Mr. LUTHER. Thank you. Appreciate that.

I think, Mr. Chairman, considering the time—and I appreciate your responses and, we'll follow up on that information. Thank you. I yield back.

Mr. TAUZIN. Thank you, Mr. Luther.

The Chair recognizes the gentlelady from New Mexico, Mrs. Wilson.

Mrs. WILSON. Thank you, Mr. Chairman.

Mr. Nasser, I appreciate your patience today as well, and I'll try to be brief. You said in your opening statement that your engineers analyzed information after you pried it from Firestone, after you asked for it in June or July, and you then insisted on a recall.

Did your engineers actually analyze information or are you just talking about the claims rates that you analyzed?

Mr. NASSER. The claims, and we asked—as I said, we asked for the claims in June and we asked——

Mrs. WILSON. So it was looking—there's no further engineering analysis that you have done?

Mr. NASSER. No, no. The engineering analysis, Mrs. Wilson, we're doing right now.

Mrs. WILSON. I'd like to follow up on some of the questions Mr. Luther was asking with respect to cases in which you are a codefendant. I assume you have to do the same annual SEC filings as every other public company. How many pending lawsuits are there for your model years 1994, 1995, 1996 and later involving rollovers and blown tires?

Mr. NASSER. I think there are about 50—50 for the last 10 years.

Mrs. WILSON. Fifty pending lawsuits in the last 10 years?

Mr. NASSER. Fifty lawsuits over the last 10 years.

Mrs. WILSON. And have you settled any of those lawsuits in which you were a codefendant with Firestone?

Mr. NASSER. I'll have to ask that.

Mrs. WILSON. Yes, you have?

Mr. NASSER. Yes.

Mrs. WILSON. What percentage—without getting into the details of any particular claim for which there is a confidentiality provision, what percentage liability has Ford assumed in those settlements?

Mr. NASSER. I don't know. We can certainly provide that and we can give it to you, if that's acceptable—by case, you can look at it case by case.

Mrs. WILSON. Does your attorney know what percentage liability you've assumed?

Mr. NASSER. It varies by case, he's saying.

Mrs. WILSON. I would like to have that data, Mr. Chairman.

Mr. TAUZIN. The Chair will request that you submit the data to the committee.

[The following was received for the record:]

Firestone/Ford Settlements of Lawsuits Alleging Tread Separation on P235/75RI5 Firestone Tires

Approximate date of settlement	Firestone % of total settlement	Firestone settlement amount	Ford % of total settlement	Ford settlement amount
September 1996	60%	$450,000	40%	$300,000
January 1998		unknown		$950,000
March 1998		$50,000		unknown
March 1998		unknown		$10,000
April 1998		unknown		$55,000
June 1998	62%	$165,000	38%	[1] $101,000
August 1998		unknown		$221,000
October 1998	85%	$850,000 (12/98)	15%	$150,000
December 1998		unknown		$25,000
May 1999		$250,000		unknown
June 1999	77%	$250,000	23%	$75,000
September 1999	86%	$1,900,000	14%	$300,000
September 1999	79%	$2,980,000 (12/98)	21%	$800,000
September 1999		unknown		$25,000
November 1999	83%	$975,000	17%	$200,000
November 1999		unknown		$175,000
December 1999		unknown		$125,000
December 1999	59%	$10,000 (2/00)	41%	$7,000
March 2000		unknown		$25,000
April 2000	92%	$4,400,000 (9/00)	8%	$400,000
August 2000		$235,000		[2] unknown
TOTALS		$12,515,000		$3,944,000

[1] According to Firestone data only

[2] Ford dealership

Mrs. WILSON. Mr. Nasser, in the cases in Venezuela and Saudi Arabia, why wouldn't Firestone participate?

Mr. NASSER. We don't know. We just don't know and we were frustrated. So in the end, when they declined, we just went ahead.

Mrs. WILSON. So they just said no, and when you asked why not—I mean, I assume you would.

Mr. NASSER. They said they just didn't want to participate. They didn't think they had a problem.

Mrs. WILSON. Why do you think they wouldn't participate?

Mr. NASSER. I don't know.

Mrs. WILSON. I have been kind of watching body language and listening to comments and so on throughout the day, and things like evaluating your relationship with your supplier on a day-to-day basis and letting us down and bumble through their answer, pry data from them. When you restart the lines, the Explorer lines that you have suspended in order to use those tire s for replacements, why on Earth would you bolt on Firestone tires at the end of the line?

Mr. NASSER. Because when you look at the data on many of their tires and many of their plants, they have got world-class tires, and if we suspected any differently, we would stop.

Mrs. WILSON. But you are a customer-driven company where quality is job one. What do your customers want?

Mr. NASSER. Well, I think looking forward—as we go forward and as we get past this replacing these bad tires with good tires, I think your question is a good one; should we offer our customers a choice of tire, should they be able to choose the type of tire that they want, and I think the answer to that is yes. Industry practice has always been limit the tire selection on a vehicle, and I look at that experience and I say maybe that isn't what a customer-focused company should be.

Mrs. WILSON. I have also been listening to some of the words that you have used, and it's clear to me that some of the lessons of quality that America has learned over the last decade have been learned at Ford, and the first criterion for the Malcolm Baldrige is leadership, and I wanted to thank you for yours.

Mr. TAUZIN. I thank the gentlelady.

The gentleman from Missouri, Mr. Blunt, is recognized.

Mr. BLUNT. Thank you, Mr. Chairman. I have a couple of questions.

I know you have been here a long time, Mr. Nasser, and you may have answered these before, and I'll try to be brief and I'll listen carefully. That way I won't have to go back and review the entire record. On the question of notification, was the company ever—was the company ever under the impression that you would have to give notification to the U.S. regulators when you made overseas—when you recalled tires overseas?

Mr. NASSER. No, it's clear that it isn't necessary, but in the case of Venezuela, when we decided to replace the Firestone tires in Venezuela, we informed NHTSA. That very same day we told them about it.

In the case of Saudi Arabia last year, as you saw from that letter, we didn't because we were frustrated with the discussions with Firestone, and we had determined at that point that the best data we had, that we did not have a problem in the U.S. market. Going forward, I think it is in the customers' best interest that if there are safety recalls anywhere in the world, that customers get a view of that because it will help customers decide. It gives customers a better basis for making a choice.

So I'd say, going forward, we're going to do it voluntarily, whether it's enacted as legislation or not.

Mr. TAUZIN. Would the gentleman yield just for a second just to make the record clear? It is correct, Mr. Nasser, that the Venezuela recall occurred after NHTSA opened its investigation here in the United States?

Mr. NASSER. Yes, it was about a week after.

Mr. TAUZIN. And when you notified NHTSA of the Venezuela incident, NHTSA was already involved in a U.S. Investigation?

Mr. NASSER. Yes, it was.

Mr. TAUZIN. Thank you, sir.

Mr. BLUNT. Just to follow up on that point, since your company intends to do it voluntarily, I assume you'd have no problem that there was a Federal requirement that it had to be done; but in terms of good business practice and following up on your product, you think that it should be done, and you intend to do it in the future in any case?

Mr. NASSER. We would support a regulation in that direction, yes.

Mr. BLUNT. Well, was it—not to carry this point too far, but wasn't there a memo—I believe it was in March 1999 where the memo indicated—I read this in the Wall Street Journal, so I'm sure it's not news to you—where the memo indicated you thought—that Ford thought, from advice they'd gotten from Firestone, that they'd have to report on a recall outside the United States?

Mr. NASSER. I'm not sure what you're referring to there.

Mr. BLUNT. There was a Wall Street Journal article, I believe yesterday, that talks about a March 12, 1999, memo, internal memo, it sounds like.

Mr. NASSER. It's the memo we talked about earlier in the testimony.

Mr. BLUNT. Well, I was gone earlier, so if you would just give me a little brief review of that.

Mr. NASSER. Firestone believed that if they concluded that there was an issue, then they would have to inform the U.S. regulators. That's what that memo is about, and I think it's in the evidence.

Mr. BLUNT. Technically is that not accurate, if they concluded there was an issue overseas, that they wouldn't have to technically inform now under the law?

Mr. NASSER. There isn't a law that mandates that declaration.

Mr. BLUNT. But you intend to do that voluntarily and would have no problem if that was a requirement?

Mr. NASSER. Yes, we do.

Mr. BLUNT. Thank you, Mr. Chairman. Mr. Chairman, thank you for the time.

Mr. TAUZIN. Thank you, Mr. Blunt.

Before we conclude, Mr. Nasser, Mr. Rogan, I think, is on his way and had a few questions.

Let me request if there are any other members who would like to ask for time for any additional questions. We're going to do like Todd Martin, we're just going to keep on going until we finish this match, and we have another panel. Mr. Boyden has been waiting very patiently to come and testify along with Mr. Ditlow, and if Mr. Shimkus is not arriving very, very soon—Mr. Rush has a question, and the Chair recognizes Mr. Rush for that question.

Mr. RUSH. Mr. Nasser, we've heard a lot about the Ford Explorer and some of the other vehicles. I wonder, does the Lincoln or the Mercury Mountaineer, do they have the same Firestone tires that are at issue today?

Mr. NASSER. Yes, they do.

Mr. RUSH. My wife wanted me to ask you that question, because she has one.

Mr. NASSER. Well, she should check to make sure it is one of the tires that is included in the recall, because the Mercury Mountaineer, of course, would have various types of tires, but she may have it. She should check, and if she does, give me a call.

Mr. RUSH. Thank you.

Mr. TAUZIN. Thank you, Mr. Rush.

Mr. Nasser, let me explore one item with you that we thought would get explored and has not been done yet. That is in the Venezuela document 32, Explorer tire DNP, current status on the reference project, background, July 1997, Ford representatives were called to a meeting in Caracas with a group of independent lawyers representing four customers. Do you have it?

Mr. NASSER. Yes, I do.

Mr. TAUZIN. Down in the middle of the page, "The results of these investigations were inconclusive, although several findings were made;" and if you go down to the last one there, "high incident vehicle rollover after a tire blowout or tread loss has not been detected for other vehicle brands. Toyota, GM and Chrysler all have significant presence in this market segment."

This is a finding in the Venezuelan investigation that other brands or vehicles—Toyota, GM, Chrysler—present in the marketplace, did not have the same high incidence of vehicle rollover after a blowout or tread separation as did the Ford Explorer. Can you explain that finding in light of your statistics indicating a much safer statistical profile for the Ford Explorer here in America?

Mr. NASSER. I can't explain it because, as you know, in Venezuela, the data on accidents and safety isn't very good. In the U.S. that data is probably the best in the world.

We have 10 years of history on the Explorer here in the U.S. market. It is one of the safest SUVs. Whether you look at it in terms of serious crashes or whether you look at it in terms of rollover, it's one of the best products in the SUV market in relation to rollover accidents.

So as with many things in Venezuela, it's probably going to take a little bit of time to really get into it and understand what the data will tell us.

Mr. TAUZIN. Well, also—and I have trouble with these acronyms, but he also says, "beginning first quarter 1999 to FOV"——

Mr. NASSER. That's Ford of Venezuela.

Mr. TAUZIN. [continuing] "notified the situation to explore a PVT"——

Mr. NASSER. Plant vehicle team.

Mr. TAUZIN. Thank you, "and the TVC"——

Mr. NASSER. I'm glad I'm here as an interpreter.

The truck vehicle center. You will catch me soon, I'm sure.

Mr. TAUZIN. [continuing] "the truck vehicle center notified of a similar issue occurring in GC"——

Mr. NASSER. That's the Gulf, they're the Gulf countries.

Mr. TAUZIN. [continuing] "Gulf countries where WDMO"——

Mr. NASSER. World direct markets organization.

Mr. TAUZIN. No wonder you're chairman, "was about to initiate a DNP"——

Mr. NASSER. Dealer notification program.

Mr. TAUZIN. [continuing] "consisting of a tire change to Goodyear brand."

We don't have a date when this happened, although this finding—this indicates, "beginning first quarter of 1999," This must have happened in 1998. All right.

Mr. NASSER. No. The Goodyear happened around the middle of last year, and the recall happened, as you know, around the middle of——

Mr. TAUZIN. Let me try this again. The language says "beginning first quarter of 1999." This seems to indicate this was written in 1998.

Mr. NASSER. No. It says, "beginning first quarter of 1999 FOV notified the situation."

Mr. TAUZIN. I see. So this is probably something that happened in 1999?

Mr. NASSER. Right.

Mr. TAUZIN. And you have no explanation for why this finding occurred in Venezuela when your own statistics indicate differently here in America?

Mr. NASSER. It's definitely different in the U.S. and that they're public data; and we're at the moment, as you know, trying to understand the situation in Venezuela.

Mr. TAUZIN. Mr. Nasser, I believe that concludes—Mr. Shimkus, I understand, is not going to make it—I mean Mr. Rogan is not going to make it. Let me apologize for holding you for that purpose, and thank you for your appearance today along with Mr. Ono and Ms. Bailey with NHTSA. We're going to have another panel.

We obviously are going to keep this record open. We will have written questions that members and staff will submit to Ford Motor. We would appreciate your response to those questions, as well as to the submissions of documents that have been requested at this hearing today.

And let me on behalf of the committee thank you for the commitments that Ford Motor has indicated at the hearing today.

The commitment to make sure that NHTSA is aware of any safety actions taken in other countries is frankly deeply appreciated. It's a huge step in the right direction, and we're anxious to work with you and the tire companies in your efforts to devise an early warning system for tire defects, and that is extremely important. As Mr. Burr has pointed out, they are indications of other trends that I hope everybody is alerted to and that we can all focus on so that we don't end up, as Mr. Rush pointed out, in another mess like this 1 day.

I thank you very much for your testimony and you are dismissed. Thank you.

The Chair will now welcome, and with deep appreciation, Mr. Samuel Boyden, the Associate Research Administrator of the State Farm Insurance Companies in Bloomington, Illinois, who is accompanied by Mr. Herman Brandau, Associate General Counsel for State Farm Insurance Companies; and Mr. Clarence Ditlow, the Executive Director for the Center for Auto Safety here in Washington, DC.

Let me, pursuant to the rules of our committee hearing, make you all aware that this subcommittee again is holding an investigative hearing, and in doing so, has had the practice of taking the testimony under oath. Do you have any objection to testifying under oath?

The Chair then advises each of you that under the Rules of the House and the rules of this committee you are entitled to be advised by counsel. Do any of you desire to be advised by counsel during your testimony today?

In that case, would you please rise and raise your right hand as I swear you in.

[Witnesses sworn.]

Mr. TAUZIN. You are each now under oath and let me begin by welcoming Mr. Samuel Boyden, the Associate Research Administrator, State Farm Insurance Companies, for your testimony, sir.

TESTIMONY OF HERMAN BRANDAU, ASSOCIATE GENERAL COUNSEL, ACCOMPANIED BY SAMUEL K. BOYDEN, ASSOCIATE RESEARCH ADMINISTRATOR, STATE FARM INSURANCE COMPANIES; AND CLARENCE DITLOW, EXECUTIVE DIRECTOR, CENTER FOR AUTO SAFETY

Mr. BRANDAU. Thank you. I'm going to begin the testimony for State Farm, and then Mr. Boyden will conclude our testimony.

Mr. TAUZIN. That's fine. Mr. Brandau is recognized.

Mr. BRANDAU. Mr. Chairman and members of the subcommittee, my name is Herman Brandau. I'm Associate General Counsel for State Farm Insurance. My responsibilities include coordination of our many public policy initiatives relating to auto safety. Accompanying me today is Samuel Boyden, an Associate Research Administrator at State Farm.

Both of us work at our company's headquarters in Bloomington, Illinois. We would like to thank the members of the two subcommittees for inviting State Farm to testify today on this very important auto safety issue.

State Farm is the Nation's largest auto insurer with 37 million policies and one out of every five cars insured. One of our top priorities at State Farm is to promote improved vehicle and highway safety. We have worked to find legislative, regulatory and competitive solutions to reduce auto crashes and protect those involved in crashes. We have taken a lead role in creating two of the most important vehicle and highway safety organizations, the Insurance Institute for Highway Safety, which is chaired this year by our CEO, Ed Rust, and the Advocates for Highway and Auto Safety, which I cochair this year.

Our current initiatives in highway safety include a partnership with the Children's Hospital of Philadelphia to research the causes of childhood deaths and injuries and highway crashes in a project where we use our research to identify and suggest ways to improve dangerous intersections. Our history and current activities on highway safety are further elaborated in our written statement.

State Farm collects and examines claims data for multiple business purposes. If problems with a particular product cause or contribute to an individual claim, we then seek compensation from the manufacturer. In some instances, the same information developed for State Farm's internal business purposes can help safety experts identify potential problems.

Mr. Boyden will now discuss his activities and relationship with NHTSA.

Mr. TAUZIN. Thank you. Mr. Boyden is recognized.

Mr. BOYDEN. Mr. Chairman and members of the subcommittees, my name is Sam Boyden. I'm Associate Research Administrator. My work at State Farm involves gathering and analyzing data on auto industry and damage-related issues from our claims file s for a number of business purposes. We are not safety regulators, but rather, where appropriate, we communicate data to NHTSA, the lead vehicle safety agency.

Since the mid-1990's NHTSA has sent us on a monthly basis details of safety-related recalls and other investigations that have been opened, upgraded or closed during that period. We sometime receive special requests on data for specific vehicles for safety concerns that have not been upgraded to a public investigation.

In response to these requests, we have searched for matching claims based on information reported to us from our local claims offices throughout the country. Our function is to serve the claims department as a resource for inquiries we receive from the field. We are not a repository of all claims data. Information that is received by us is provided at the judgment and discretion of our individual claims representatives. Most of the data we provide NHTSA is in response to a request from the agency. However, we do notify NHTSA of potential claims trends being reported from our field offices.

We are in regular communication with NHTSA by e-mail and telephone on a wide range of related issues. In a year, we share information on approximately 150 investigations and evaluations that are undertaken by NHTSA. Identifying trends and claims data is quite different from the requirements of investigating safety concerns and issuing product recalls. State Farm does not report defects. Rather, it reports claims trends that may reflect the possibility of a product defect.

Regarding the Firestone tire issue, on July 22, 1998, I had a conversation with NHTSA and followed up with an e-mail stating we had noticed 21 reports regarding Firestone ATX tires. I noted that 14 of the 21 reports were for tires on 1991 to 1995 Ford Explorers. Subsequently, during the summer of 1999, I telephoned NHTSA to discuss this issue, among others, with them. Again, on December 2, 1999, I receive d a phone call from NHTSA to discuss a number of vehicle-related issues. During our conversation, I again mentioned the Firestone ATX tire issue.

On April 25, 2000, in response to a request from NHTSA, I sent an e-mail in which I provided additional information on Firestone ATX, ATX II and Wilderness tires. I gave a breakdown by calendar year, the tire type for the period covering 1996 through April 2000, and provided information on 70 reports.

We thank you for the opportunity to appear before your subcommittees. In particular, we would like to thank the staff of the committees for their help in preparation for this hearing.

Auto safety is a prime concern for State Farm. If there is any other information or assistance that we can give these subcommittees or your staff on this or other safety-related matters, we'll always be available to assist.

[The prepared statement of Herman Brandau and Samuel Boyden follows:]

PREPARED STATEMENT OF HERMAN BRANDAU, ASSOCIATE GENERAL COUNSEL AND SAMUEL BOYDEN, ASSOCIATE RESEARCH ADMINISTRATOR, STATE FARM INSURANCE COMPANIES

INTRODUCTION

My name is Herman Brandau, I am Associate General Counsel for State Farm Insurance. My responsibilities include coordination of our many public policy initiatives relating to auto safety. Accompanying me today is Samuel Boyden, an Associate Research Administrator at State Farm. Both of us work at our company's headquarters in Bloomington, Illinois. We would like to thank the members of the two subcommittees for inviting State Farm to testify today on this very important auto safety issue.

State Farm is the nation's largest auto insurer with 37 million policies and one out of every five cars insured. One of our top priorities at State Farm is to promote improved vehicle and highway safety. We work to find legislative, regulatory, and competitive solutions to reduce auto crashes and protect those involved in crashes. We also seek ways to reduce injuries by restraining or protecting vehicle occupants.

One of the first highway safety issues State Farm addressed was the problem of "booby-trapped" roads. We worked to improve the designs of bridges, poles, warning signs and other roadside hazards so as to minimize the chance of death or serious injury resulting from collision with these objects. In the 1960s, we worked to create the Insurance Institute for Highway Safety (IIHS). IIHS is the leading private vehicle and highway safety research organization. It attacks safety issues by addressing the three major safety components: the highway, the driver, and the vehicle. Ed Rust, our Chairman and CEO, is the current IIHS chairman. In the 1970s and early 80s, State Farm was involved in the battle to obtain airbags for passenger vehicles. State Farm was the lead party in the case that reached the Supreme Court, which led to reinstatement of the passive restraint requirement. In response to the Court's decision the passive restraint rule was reinstated. This decision and later federal legislation led to the current requirement that all passenger vehicles have both driver and passenger side air bags. In 1989, State Farm was one of the companies that helped form the Advocates for Highway and Auto Safety. This organization includes insurers, safety groups, medical groups, law enforcement organizations and consumer advocates working to improve vehicle and highway safety. Working with the Advocates, we have sought legislation to reduce drunk driving, improve vehicle safety and increase seat belt use. I serve as the current co-chair of the Advocates for Highway and Auto Safety.

In more recent years, we have played a major role in a number of safety related initiatives. We helped create the the Airbag and Seat Belt Safety Campaign whose objectives include improving adult and child restraint usage and the enactment of primary seat belt laws. We have also entered into a partnership with the Children's Hospital of Philadelphia to research the causes of childhood death and injuries in highway crashes. The partnership's researchers recently released important research results recommending increased use of booster seats by children between the ages of 4 and 8. In 1999, we undertook our dangerous intersection project. We use our research to identify intersections where there are the most crashes and have offered to assist communities to study ways of improving safety at these intersections. We also work directly with automobile manufacturers on issues of reparability.

State Farm collects and examines claims data for multiple business purposes. If problems with a particular product cause or contribute to an individual claim, we seek compensation from the manufacturer. If a trend emerges with the same product—either from our own data or as identified in a product recall—we respond to our claim employees' inquiries with information helpful in seeking compensation from the manufacturer. In some instances, the same information developed for State Farm's internal business purposes can help safety experts identify a potential problem.

Sam will now discuss his activities and relationship with The National Highway Traffic Safety Administration (NHTSA).

INFORMATION EXCHANGE WITH NHTSA

My work at State Farm involves gathering and analyzing data on auto injury and damage related issues from our claims files. We are not safety regulators, but rather where appropriate, we communicate data to NHTSA, the lead vehicle safety agency. Since the mid 1990's, NHTSA has sent us, on a monthly basis, details on safety related recalls and other investigations that have been opened, upgraded or closed during that period. We sometimes receive special requests for data on specific vehicles for safety concerns that have not been upgraded to a public investigation. In response to these requests, we search for matching claims based on information reported to us from our local claims offices throughout the country. Our function is to serve the Claims Department as a resource for inquiries we receive from the field. We are not a repository of all claims data. Information that is received by us is provided at the judgment and discretion of individual claim representatives.

Most of the data we provide NHTSA is in response to a request from the agency. On occasion, however, we advise NHTSA of potential claim trends being reported from our field offices. A decision to initiate a contact with NHTSA is based on a number of factors, including whether a search of our information reveals a number of similar reports or cases with possible safety implications with a particular vehicle model within a specific time frame. We are in regular communication with NHTSA by e-mail and telephone on a wide range of related issues. In a year we share information on approximately 150 investigations and evaluations that are undertaken by NHTSA. Identifying trends in claims data is quite different from the requirements of investigating safety concerns and issuing product recalls. State Farm does not report defects; rather it reports claims trends that may reflect the possibility of a product defect.

FIRESTONE TIRE ISSUE

On July 22, 1998, I sent an e-mail to NHTSA stating we had noticed 21 reports regarding Firestone ATX tires. I noted that 14 of the 21 reports were for tires on 1991 to 1995 Ford Explorers. I did not receive any particular response or follow up from NHTSA at the time. I continued to communicate with NHTSA on a great number of issues. Subsequently during the summer of 1999, I telephoned NHTSA and discussed this issue among others with them again. On December 2, 1999 I received a phone call from a NHTSA representative to discuss a number of vehicle related issues. During our conversation I again mentioned the Firestone ATX tires issue.

On April 25, 2000 in response to a request from NHTSA, I sent an e-mail in which I provided additional information on Firestone ATX, ATX II and Wilderness tires. I gave him a breakdown by calendar year and tire type for the period covering 1996 to April 2000. I provided him information on 70 reports.

We thank you for the opportunity to appear before your subcommittees and in particular we would like to thank the staff of the subcommittees for their help and assistance in preparation for this hearing. As we noted in our statement, auto safety is a prime concern for State Farm. If there is any other information or assistance that we can give these subcommittees or your staff on this or other safety related matters, we will always be available to assist.

Mr. TAUZIN. Thank you, Mr. Boyden.

Mr. Ditlow, the Executive Director of the Center for Auto Safety here in Washington, DC.

TESTIMONY OF CLARENCE DITLOW

Mr. DITLOW. Thank you, Mr. Chairman and other stalwart members of the committee. I'm happy to see you stayed to hear a few words from us. I'll keep them brief.

The Center for Auto Safety has been looking at automobile defect s for 30 years, and we have never seen or found an automobile defect before it was found by the automobile manufacturers. And in March, on the 2d of this year, I gave a talk at the Clemson University Tire Industry Conference, attended by executives from the auto companies and from the tire companies. And at that time I told the assembled audience that the Firestone ATX on Ford Explorers was the next Firestone 500, and the No. 1 tire concern from consumers was why were so many Ford Explorers rolling over after Firestone ATX tread separation—2 months before NHTSA opened its investigation, 5 months before the first recall.

And NHTSA had an earlier warning from State Farm, as we have just heard, in 1998 and we've seen today a lot of analysis by this committee and by Ford and Firestone of the 2,400 Firestone claims. Yet I saw a document submitted by Ford Motor Company, dated July 24, cover letter in the public record at NHTSA, discussing the fact that Ford Motor Company in its owner reports had received about 1,100, as I recall, complaints of blowout, tread separation and other tire failures in the subject vehicles.

Now, that's getting up to knowledge at Ford Motor Company and a level of Firestone, but the trouble is, for the American public, and this goes across the—all the different sources of data that we have, that information is not yet in the public file. The American—so we would like to analyze it. We'd like to look at it, find out what types of complaints they are. How do they compare to the Firestone claims? When do they occur? What tires are they on? Those are all unanswered questions.

The two big questions for the American public today are, if Ford recalled the 16-inch tire abroad, why aren't they recalling it here? If the Decatur plant is making bad tires, why aren't other tires at the Decatur plant being recalled? Until we have that information on the public record giving explanations that we can understand and not being held confidential, position is, all the Firestone ATX, all the Firestone ATX II and all the Wilderness tires regardless of the plant and regardless of the size should be recalled.

The final thought that I would like to give you on the investigation process is that historically the agency has opened investigations on as few as one complaint. The seminal litigated case in this country is the Kelsey-Hayes wheels case that was opened, as the court of appeals noted, on the basis of one complaint. The failure rate was 0.2 percent on the wheels and they set forth the test for looking at defects, the balance, the frequency versus the severity.

When the Center for Auto Safety testified before this committee in 1978—and I was the individual doing it—there were 14,000, or 14,000 consumer complaints on the Firestone 500 tires, only 41 deaths. Today, we see 1,400 complaints but 88 deaths. The difference is the vehicle that it is on, and we should go forward—and I want to do one thing. I want to commend this committee for putting on the public record more information than the public has received to date from NHTSA, Ford or Firestone.

Thank you.

[The prepared statement of Clarence Ditlow follows:]

PREPARED STATEMENT OF CLARENCE DITLOW, CENTER FOR AUTO SAFETY

Mr. Chairmen and members of the Subcommittees, thank you for the opportunity to testify on the recall of Bridgestone/Firestone tires on Ford light trucks and sport utility vehicles (SUVs). I am Clarence Ditlow, Executive Director of the Center for Auto Safety (CAS) which is a non-profit organization founded by Consumers Union and Ralph Nader in 1970 but is now independent of both. The Center works to improve vehicle and highway safety.

In May 1978, I testified before this Commerce on the Firestone 500 steel-belted tires when CAS successfully campaigned to get 19.5 million Firestone tires recalled. Unfortunately, one of the key recommendations of the Committee to upgrade Federal Motor Vehicle Safety Standard (FMVSS 109) was never acted on by the National Highway Traffic Safety Administration (NHTSA). FMVSS 109 which sets performance standards for tire strength, endurance and high speed performance was developed in the late 1960's and early 1970's when there were very few radial tires and no SUVs on the road. NHTSA withdrew the only enforcement action it ever brought under the standard because it was so vague and difficult to enforce. A tire for an SUV could be certified to the even more lenient Safety Standard 119 for non-passenger tire cars.

Although there are many similarities between the Firestone 500 and the Firestone/Ford tire failures, there is a key difference—the role of the vehicle on which the tires are mounted. In the Firestone 500 recall, there were more tires and complaints (14,000 then versus 1,400 today) but fewer deaths (41 then versus 88 and rising today). The primary vehicle in which Firestone ATX, ATX II and Wilderness tire tread separations and deaths have been associated is the Ford Explorer, an SUV which has been marketed as a passenger car. Although the Explorer meets essentially the same standards as passenger cars (albeit on a delayed schedule) there are no standards on rollover and only a weak standard on roof strength for rollover protection.

Although the Explorer superficially drives like a passenger car, it is easier for a driver to lose control of an Explorer than a passenger car when a tire fails. When the Explorer goes out of control, it is more likely to roll over than a passenger car, and when it rolls over, its occupants are likely to be injured.

In short, the Ford Explorer or other SUV is the worst kind of vehicle on which to put a bad tire. A tread separation or other tire failure can lead to a fatal rollover. A tire made for an SUV like the Explorer should have an extra margin of safety built into it like a nylon ply because the consequences of failure can be so bad. If reports that Goodyear tires on Ford Explorers have had no tread separations prove true, then it is critical to examine the differences between the Goodyear and Firestone tires on these vehicles.

As the tragic toll of 88 known deaths and 250 injuries continues to climb and more information is added to the public record, it becomes clearer and clearer that both Ford and Firestone knew more earlier but failed to act until there were too many complaints, deaths and injuries to conceal Firestone tire failure on Ford Explorers from public attention. Yet all the new information generates more questions than answers:

- Who set the specifications for the ATX, ATX II and Wilderness tires? Did Ford "squeeze the rubber out" by requiring too light a tire with too low rolling resistance?
- If only the Decatur, Illinois Firestone plant made bad Wilderness tires due to poor quality control and worker unrest, than why aren't other tires produced there equally bad?
- If only 15" tires are bad, then why did Ford recall 16" Firestone tires in other countries? And why didn't Firestone recall any tires in other countries?
- Why did Ford make suspension changes in Venezuela and not in the US? Was Firestone aware of the suspension changes made by Ford?
- If 26 pounds pressure is too low, why did Firestone go along with Ford?
- What are the failure rates on ATX, ATX II and Wilderness tires and what are the failure rates on other Firestone tires made during this time? Do these tires have lower failure rates on other SUVs?
- What is the difference between the different size ATX, ATX II and Wilderness tires?
- Did GM and other auto companies set different specifications for their tires?
- Were Firestone tires certified and tested to FMVSS 109 passenger car tire standard or the more lenient FMVSS 119 light truck tire standard?
- What Firestone tires are on what vehicles and what is the difference in failure rates by different applications?

Firestone and Ford Early Knowledge

Emerging information show that both Ford and Firestone had early knowledge of tread separation in Firestone tires on Ford Explorers and other Ford vehicles. Product liability lawsuits were filed in the early 1990's on Explorer rollovers caused by Firestone tire failures. NHTSA began receiving consumer complaints in 1990-93 and provided Ford and Firestone with summaries of all such complaints as part of its standard policy. In 1996, Arizona state agencies confronted Firestone about tread separations, particularly in hot weather, in Firestone steel-belted radials. In 1998, Ford began receiving complaints on Firestone tire failures on Explorers in other countries. That same year, State Farm Insurance informed NHTSA that it had received 21 damage claim reports on Firestone radial failures. In late 1999, Ford began to replace Firestone tires on Explorers in other countries but failed to notify NHTSA.

By late 1999, information that Ford and Firestone were settling product liability lawsuits with gag orders reached CAS through Strategic Safety, a consulting firm which has played the leading role in uncovering the Bridgestone and Ford tire crisis. At about the same time, the number of lawsuits and Explorer rollover accidents had reached such a critical mass that local media in Texas, California and Florida began to investigate and contact. By March 2, 2000, CAS had received so much information that I spoke at Clemson University's Annual Tire Industry Conference attended by auto and tire officials and asked why so many Firestone ATX tires were failing on Ford Explorers and called it the next Firestone 500. At the same time Strategic Safety and CAS urged NHTSA to open an investigation on this matter which it did on May 2, 2000.

Why Didn't NHTSA Learn About Firestone/Ford Earlier

Tire defects are difficult to discover because so few consumers complain about them and because existing crash data bases are not detailed enough to identify them. When CAS initiated its efforts on the Firestone 500, we received no more than 100 tire complaints per year compared to 15,000 vehicle complaints. NHTSA is no different than CAS and receives very few tire complaints compared to vehicle complaints. To compound matters, few of the consumers who do complain provide the crucial tire identification number located on the inside side wall or even the size and model of tire. CAS goes back to consumers for such information but can no longer do so in the case of complaints in NHTSA's data base because NHTSA keeps their identity confidential.

NHTSA should have opened an investigation in 1998 when State Farm provided information on the 21 claims because the agency often opens a defect investigation on as few as two complaints as this Committee has noted in the past. Rather than being low, the 21 State Farm claims is almost astronomical. NHTSA needs to cast a broader net on tire complaints because so few come into the agency and because the consequence of tire failure can be so catastrophic compared to other defects. If NHTSA doesn't have the authority to compel information on foreign recalls, then it should be given that authority by Congress.

CAS v Bridgestone/Firestone and Ford

On August 25, CAS sued Bridgestone/Firestone and Ford in US District Court for the District of Columbia to obtain an injunction ordering the replacement of all ATX, ATX II and Wilderness tires regardless of size and plant where made. This lawsuit is the first ever filed by against CAS auto/tire industry companies and reflects our concerns over the design of these tires for Ford SUVs. Recalls by Ford in foreign countries have not been limited to 15" Firestone tires and should not be limited to 15" tires in the US. For the Wilderness AT, this cannot be a Decatur IL plant problem or all tires lines and models made at Decatur would be equally defective. We are pleased to see that NHTSA has begun to support our position by requesting the recall of 1.4 million more Firestone tires including many models in sizes other than 15" and in particular 16" Wilderness AT tires from the Wilson NC plant made for 1996-98 Ford F150s. However, we are very disturbed to see that NHTSA has chosen not to make public its list of 88 deaths which would show the manufacturing plant, size and model of each tire linked to a death. We also question why NHTSA has put so little information into the public file on this investigation and has not even put into the public record requests for confidential treatment of information submitted by Ford/Firestone.

Legislative Recommendations

A particular dilemma with tire recalls is that a manufacturer has no obligation to replace a tire for free if it is more than 3 years old. With radial tires that last 50,000 miles or more, this limit should be repealed. If a manufacturer conceals a defect until the statutory period for free repair or replacement expires, they can get away without a recall. In cases of concealment, the statutory limit on free replacement and repair should be tolled. Moreover, the statute does not provide for reimbursement where a consumer pays for replacement or repair prior to a recall. Congress should remedy that by providing for reimbursement in the statute.

The Firestone/Ford recall of 6.5 million tires to date shows another problem in the recall system—the shortage of critical safety components such as these tires in large recalls. If parts and tires are unavailable from the recalling manufacturer, then the public rides at risk until replacements become available for their vehicles. CAS is aware of at least 5 deaths in rollover accidents involving Firestone tire tread separation on Ford Explorers since the initial recall was announced. Although Ford and Firestone have announced they would reimburse consumers who buy competitor tires, there is no guarantee they will do so. Indeed, Firestone rescinded its offer until a Kentucky court issues an order prohibiting it. The Safety Act should be amended to give NHTSA the authority to order replacement and repair from competitors where there is an imminent safety hazard and the recalling company cannot meet demand.

Since NHTSA failed to implement this Committee's recommendation in 1978 that FMVSS 109 be upgraded, Congress should amend the Safety Act to require NHTSA to upgrade not only FMVSS 109 but also FMVSS 119 with specific direction to determine whether a even more stringent tire standard should be set for SUVs with their higher rollover propensity than passenger cars. This Committee should also direct NHTSA to reassess its 1981 decision to drop its proposed rulemaking on low tire pressure warning devices.

The maximum present penalty for concealing a defect and failing to conduct a recall is a maximum fine of $925,000. Interestingly, the highest fines ever assessed have been against Firestone and Ford—$500,000 against Firestone in 1978 over the 500 steel-belted radial and $425,000 against Ford in 1999 over the defective ignition switches that started vehicle fires. The Safety Act should be amended to provide criminal penalties for knowing and willful violations of safety standards and refusal to recall in line with FDA and CPSC authority and in removing the ceiling on civil penalties under the Safety Act to be in line with the Clean Air Act which has no ceiling for violation of vehicle emission standards.

These legislative recommendation are designed to prevent another public safety crisis like the Firestone tires on Ford Explorers from ever happening again. But for now, the single most important thing to be done is for Ford and Bridgestone/Firestone to recall all ATX, ATX II and Wilderness tires regardless of size and plant where made.

Mr. TAUZIN. Thank you, Mr. Ditlow.

The Chair recognizes himself.

First of all, Mr. Ditlow, when was that information of 1,100 tire failures submitted to Ford?

Mr. DITLOW. That was submitted—July 24, which was put in the docket at NHTSA; the cover letter——

Mr. TAUZIN. July of this year?

Mr. DITLOW. July of this year in its investigation.

Mr. TAUZIN. So that's at NHTSA right now?

Mr. DITLOW. It's in the record, but hasn't been analyzed.

Mr. TAUZIN. Let me turn to you, Mr. Boyden. What prompted you on your own volition to send the e-mail to NHTSA detailing the 21 cases of tire separation and accident and fatality to the attention—what made you think that that was pretty significant?

Mr. BOYDEN. Okay. The way we receive this information is when our claims representatives phone in to our corporate office. They're trained to see things unusual in the claims that they're handling, and at that point contact us at corporate; and generally they're inquiring if there's already a recall or an investigation regarding that problem.

Also, as they're calling, we collect that data from that claim.

Mr. TAUZIN. So you have claimants around the country calling you and saying, what's going on here, is there a recall pending, investigation, something going on, claims reps calling you?

Mr. BOYDEN. And we, at that point, also collect that information for internal purposes. During 1998 and—June 1998 we received a call. In July 1998 we received three calls, all for Firestone ATX tire tread separations. In the process of looking back at any previous records we had, that's when we spotted the others.

Mr. TAUZIN. So the calls alerted you to look for the trend, and you discovered it?

Mr. BOYDEN. Correct.

Mr. TAUZIN. And you thought it was serious enough that NHTSA ought to know about it?

Mr. BOYDEN. From what we were seeing, we had ATX tires mentioned in each one of these files, tire tread separation. We had some pretty serious losses in the almost 21. There were two fatalities, and with that information, like I said, we can't determine if that's an actual defect, but it was definitely a claims trend we were seeing.

Mr. TAUZIN. Did you see any other trend like that with other tires?

Mr. BOYDEN. No, not at that time.

Mr. TAUZIN. So this is pretty unique and you reported these 21 cases with this unique pattern to NHTSA. Did you get any reply from NHTSA?

Mr. BOYDEN. During 1998 is when we really first started e-mail communications. At the first of the year, we had some difficulties. Mine weren't reaching NHTSA and theirs weren't reaching me, and we worked through that, but we pretty much came to the protocol that I would call, discuss something first, and then e-mail, and if they didn't get it, they would call me and the same——

Mr. TAUZIN. Did they ever call you and say, did you get our e-mail?

Mr. BOYDEN. No.

Mr. TAUZIN. As far as you know, they never tried to communicate back with you after they received your e-mail detailing this very alarming trend?

Mr. BOYDEN. Not on that particular issue. As I mentioned earlier, though, we are in conversation on 150 different investigations in the year. So we're constantly speaking.

Mr. TAUZIN. But you called them back, and you called them back obviously to talk about a number of things, but you gave them an update, didn't you?

Mr. BOYDEN. Yes.

Mr. TAUZIN. When did that occur?

Mr. BOYDEN. That was in midyear 1999, and for whatever reason I didn't have that logged.

Mr. TAUZIN. But you called them midyear and gave them a report. And what was your report?

Mr. BOYDEN. The report was—when I shared the information in July 1998, we only had four reports called in for 1998. It's something we need to keep in mind here, too—I've heard this phrase used a few times—this is not our universe of claims. These calls that come in to our corporate office are at the discretion of our claims reps. They're not required to call these in.

Mr. TAUZIN. So these didn't represent all the cases? These represented—these were the ones they thought serious enough to call you and talk to you about it and say, what's going on here?

Mr. BOYDEN. By the end of 1998, we had received 10 more.

Mr. TAUZIN. You received 10 more by the end of 1998. So for a total of 14 in 1998?

Mr. BOYDEN. Correct.

Mr. TAUZIN. And you notified the agency of this?

Mr. BOYDEN. Right.

Mr. TAUZIN. What did the agency tell you?

Mr. BOYDEN. I can't remember.

Mr. TAUZIN. Who did you talk to?

Mr. BOYDEN. At that time, we had one contact that we dealt with all the time.

Mr. TAUZIN. Was his name Bill Duckwitz? ?

Mr. BOYDEN. Correct.

Mr. TAUZIN. So you talked to Bill Duckwitz at the agency, who was the liaison, I believe, to State Farm, correct?

Mr. BOYDEN. Correct.

Mr. TAUZIN. And you don't recall what he had to say, but as far as you know, you never heard any more from him?

Mr. BOYDEN. Generally, there weren't any of our phone conversations that dealt with one subject.

Mr. TAUZIN. You dealt with a number of subjects. But you then you received a call from him on December 2, 1999?

Mr. BOYDEN. Right.

Mr. TAUZIN. And that is logged at State Farm?

Mr. BOYDEN. That was logged.

Mr. TAUZIN. We have a copy of that log and a copy of your memo on it, and you talked about a number of things, but it says you talked about the Firestone ATX tires. What did you tell him in December 1999?

Mr. BOYDEN. Again, that the numbers seem to be escalating.

Mr. TAUZIN. In fact, you gave him some more numbers, didn't you?

Mr. BOYDEN. Correct.

Mr. TAUZIN. How many more?

Mr. BOYDEN. Like mid-30's.

Mr. TAUZIN. Yeah. We have 35 in our records.

You reported 35 more incidents like the 10 you reported in the second phone call and the 21 you reported in the e-mail. That's 21 and 10 is 31 and 35 more, 66 incidents you reported from July 1998 to December 1999 to the agency.

Did you expect the agency to take you seriously and start an investigation?

Mr. BOYDEN. I know that NHTSA has a lot of investigations that they are working on. As far as my knowledge of their internal workings, I can't really speak for their internal workings.

Mr. TAUZIN. Mr. Ditlow, you make the point that one complaint was enough at NHTSA to provoke one of the most important cases dealing with safety in the history of the agency. Here were 66.

Does it surprise you the agency did not begin an immediate investigation?

Mr. DITLOW. It goes beyond that. It shocks me because these weren't just complaints; there were fatalities in there. And they pay particular attention to accidents involving fatalities. It may take fifty or 100 complaints if there aren't any deaths or injuries, but very often if there's one death, two deaths, I would say it's the rule, rather than the exception, to open an investigation if you have multiple complaints with multiple deaths.

Mr. TAUZIN. In fact, in this case, we had multiple deaths.

Mr. DITLOW. In this case, we had multiple deaths and we had far more than a handful——

Mr. TAUZIN. How can you explain the agency's inactivity?

Mr. BOYDEN. Mr. Chairman, there's one area that hasn't been discussed. One area that State Farm is extremely sensitive——

Mr. UPTON. This is a new legislative day we're starting now.

Mr. TAUZIN. Could well be.

Mr. BOYDEN. Extremely sensitive to our policyholders privacy. We've worked with NHTSA for quite some time and they're very aware of that. When we share this information in these inquiries, they are blocked. There are no identifiers to our policyholders from their VIN number or names. I don't believe they put it in their public data base. They have the information with the individual engineers, but I don't believe it——

Mr. TAUZIN. Could never have made it into the data base?

Mr. BOYDEN. The way it normally works, if it's information we share or if it's only on given investigations that are open, if they want to take it to the next level, then we make contact again; and then I contact our claims representatives, who in turn contact our policyholders——

Mr. TAUZIN. But they never asked you to do that, did they?

Mr. BOYDEN. Not at that point.

Mr. TAUZIN. It just went into some black hole somewhere?

Mr. BOYDEN. I'm not sure about black holes.

Mr. TAUZIN. Let me say, I think if there are any heroes in this awful saga, it's the television station in Houston who connected the dots, Mr. Shimkus. And Mr. Boyden, I put you in the same category. Let me thank you for not only taking the trouble to spot this trend, but for reporting it when you did.

I just can't help but imagine what would have happened had you been taken seriously, had the recall started in 1998 instead of the year 2000, and how many of those folks who are no longer with us had had a chance to replace their tires in time.

Mr. BOYDEN. There is one area that—and I spoke with a lady this week, in fact she called, not a State Farm policyholder, but after she had read an article that she saw we were looking into 16-inch vehicle tires also, she called from Tulsa, Oklahoma, I believe it was; and I explained to her the need to contact NHTSA. And this is another area that I think we've seen, early on that NHTSA didn't have the complaints in their data base.

The more people I spoke with are really not aware of the fact that in their vehicle owner's manual is a procedure to contact NHTSA.

Mr. TAUZIN. Let me say it again so everybody hears it. There is in your vehicle owner's manual, every consumer who owns a vehicle purchased in this country, in the owner's manual is a section on how to contact NHTSA if you have one of these safety problems.

What you are saying, Mr. Boyden, is you are hopefully advising more people to do that, right?

Mr. BOYDEN. Half of the individuals that own these vehicles and had these losses, no matter how severe, even minor damages, and they felt as though that was a safety-related problem and had contacted NHTSA, we wouldn't have to concern ourselves with my e-mail or the news broadcast; NHTSA would have already been made aware of this.

Mr. TAUZIN. Well, but the fact is, you took the trouble to do it for them and, unfortunately, I think you were ignored.

The Chair yields to the gentleman from Michigan, Mr. Stupak.

Mr. STUPAK. Thanks, Mr. Chairman.

I think we would all agree, Mr. Boyden, that when you have an accident like this, the last person on your mind is probably NHTSA, right?

Mr. BOYDEN. That is true.

Mr. STUPAK. With all due respect, the first thing you do is get ahold of the manufacturer of your vehicle and the manufacturer of your tire, because when you go to the vehicle, in this case Ford, they will tell you we don't warrant it, you have to get ahold of Firestone, if there is a Firestone in your area.

Mr. BOYDEN. It depends on the size of the accident also.

Mr. STUPAK. Sure.

Mr. BOYDEN. If it is a larger accident, normally they contact their agent.

Mr. STUPAK. Do you have any idea what NHTSA did with the information you sent them by e-mail in 1998?

Mr. BOYDEN. No, I don't. Once I sent it, I realized—I didn't get a contact back, so I knew they received it.

Mr. STUPAK. The same with 1999, the summer of 1999 and again in December 1999; do you know what they did with it?

Mr. BOYDEN. As far as I knew, it was being forwarded on to the——

Mr. STUPAK. Again, you didn't get any reply back, saying we didn't get your e-mail or something like that, right?

Mr. BOYDEN. Right. Like I said, we were working on a number of different issues at the time.

Mr. STUPAK. Well, let me ask you this. What do you think NHTSA should have done with the information you provided them in 1999 and 1998?

Mr. BOYDEN. At that point, what I was really sharing with them was a trend that we were seeing, a claim trend.

Mr. STUPAK. Sure.

Mr. BOYDEN. The way I would feel is that they had looked into it and possibly because of the numbers, didn't feel there was an issue at that time.

Mr. STUPAK. So you were at least reasonably confident that someone was at least looking at the information you were sending?

Mr. BOYDEN. Yes. Yes.

Mr. STUPAK. Thanks, and thanks for your testimony.

Mr. BOYDEN. Thank you.

Mr. STUPAK. Mr. Ditlow, it was testified by Ford today about early warning system reporting. What early warning system for tire safety effects should be in place for the tire manufacturer and for the automobile manufacturer and NHTSA?

Mr. DITLOW. Well, one requirement should be that if there is an adjustment rate above 1 percent, that—or a threshold that NHTSA picks out—that it be reported to the agency. And what we have seen is the adjustment rates have gone down over the years, but the consequences have gone up, so you might want to adjust that.

The same thing would go with the automobile manufacturers. What you need to do when you are dealing with tire defects is you have to cast a bigger net, because so few consumers actually complain about a single failure. They replace the tire, they go on. Unless they have multiple failures or an accident, a consumer is not likely to complain, so the agency needs to be more proactive.

In the case of the Firestone 500, the agency actually did a 100,000 vehicle survey to try to get information on respective failure rates, but they no longer have the money to do that.

So my two recommendations are warranty or adjustment rates and the reporting of product liability lawsuits.

Mr. STUPAK. In 1978, Mr. Ditlow, NHTSA requested money from Congress to develop a tire inflation warning system because "a significant percentage of tires" in use then were at least 10 pounds underinflated. NHTSA didn't get the money. Do you think the situation would have been different if they would have received those funds?

Mr. DITLOW. I certainly feel that if we had low tire pressure warning devices on automobiles, we would have had fewer failures, because people, they look at radial tires, they are not sure. Today we have far more self-service stations, fewer attendants. The problem is even bigger today than it was then.

Mr. STUPAK. You testified back in 1978 concerning the previous Firestone problem with the Firestone 500's, did you not?

Mr. DITLOW. I testified, yes.

Mr. STUPAK. And at that time, you stated that in the 8 years of monitoring vehicle safety defects, only the Pinto gas tank had claimed more lives than this tire, meaning the Firestone 500. At that point, the Firestone 500 was responsible for 16 deaths, 15 injuries. For the AT and the ATX, there are over 80 deaths recorded, and injuries.

Is this a new record for the worst safety defect?

Mr. DITLOW. Well, unfortunately, it is in the top three. Unfortunately, the records have continued to be broken over the years, and the GM side-saddle gas tanks is the record now at 150.

Mr. STUPAK. What else do you think should have been done here? I mean, an early warning system reporting maybe, but what other recommendations do you think should be done here?

Mr. DITLOW. Well, one—we do need to upgrade Standard 109. This committee recommended that back in 1978. The situation with sport utility vehicles, they have a higher center of gravity. A tire failure today is more likely to result in an accident than a tire failure would have on a passenger car back in those days. So that is my next most important recommendation in the tire area.

Then finally, for consumers who actually have these tires, let's put the tire I.D. number on the outside sidewall so you don't have to crawl under it and look to see whether or not you have one of the vehicles subject to a recall. That tire identification number is the single most important piece of information on a tire, and yet it is the hardest to find.

Mr. STUPAK. I had suggested and then I got commitments from both Firestone and Ford to do an independent review of all that has happened outside their shops. Do you think that would be helpful in this case?

Mr. DITLOW. Yes, it would be.

Mr. STUPAK. Thank you, Mr. Chairman. I see my time is up. I have no further questions.

Mr. TAUZIN. Thank you, Mr. Stupak.

The Chair recognizes the chairman of the O&I subcommittee, Mr. Upton.

Mr. UPTON. Thank you, Mr. Chairman. I hope not to take my full 5 minutes. I just want to say, Sam—if I can call you Sam—I thought this story was terrific in Friday's Journal and I am glad that your three kids and wife are proud of you, and as a State Farm policyholder, I am proud of you too.

Mr. BOYDEN. Thank you.

Mr. UPTON. I know you compiled, I think for Mr. Brandau at least, the documents that were provided to the committee which are fairly thick, about a half-inch thick of literally, well, I guess there is about 75 cases here or so, detailing all of these different instances that you sent on to, I guess Mr. Brandau, formerly sent on to NHTSA, is that right?

Mr. BOYDEN. I referred those to——

Mr. UPTON. You did the work, but Mr. Brandau did the cover note to us, I guess.

Mr. BRANDAU. To you, absolutely.

Mr. UPTON. And you didn't even mention Mr. Boyden in here, I don't think. Oh, yeah, there he is. He has a letter in there as well. I guess it is a letter to us.

But all of this information, seriously now, all of this information was transmitted to NHTSA, was it not?

Mr. BOYDEN. Right, it was.

Mr. UPTON. Did you detail all of this information to them?

Mr. BOYDEN. With the exception of——

Mr. UPTON. Mr. Brandau's cover note, but at least you have your picture in there.

Mr. BOYDEN. I have my picture in the paper.

Mr. UPTON. As I thumb through all of these—I have been in Michigan, I didn't come back, really today is my first full day back as it is virtually every member of the committee—but it is just a telling document, page by page by page, about all of these failures that Firestone had.

Mr. BOYDEN. Right.

Mr. UPTON. Now, you sent this on to NHTSA. We know the history of their response or lack of response back to you. Did you ever think about sending it to Firestone or even to Ford?

Mr. BOYDEN. Our claim representatives, on their individual claims, they more than likely contacted Firestone through subrogation. So I really didn't have a contact with Firestone to hear that.

Mr. UPTON. So it is a door that is just closed from the beginning.

Well, again, I want to thank you, along with other folks here. I know that the committee thanks you as well, because if it hadn't been for you and Channel 11, we would probably all be home with our wife and kids tonight instead of here looking at a very serious situation that obviously governs the attention of this committee in its entirety. And I welcome this information and thank you very much for stepping forward and telling your story. Thank you.

Mr. BOYDEN. Thank you for having us here.

Mr. TAUZIN. Thank you, Mr. Upton. We wish perhaps you had thought to send this information to KHOU in Houston in July 1998. Maybe this thing would have started a little sooner.

The Chair recognizes Mr. Sawyer.

Mr. SAWYER. Thank you, Mr. Chairman.

Thank you both very much for all that you have done. I particularly, I keep hearing you characterized as an automotive enthusiast, and it is nice to see somebody who is an enthusiast who can find safety not compromised by that enthusiasm, and that they are compatible with one another.

State Farm participated in 1998 with the review of the Federal Motor Vehicle Safety Standards in Section 109, along with a number of other participants. Would it be possible for you to share your recommendations with regard to 109 with this committee?

Mr. BRANDAU. That is the tire standard?

Mr. SAWYER. Yes.

Mr. BRANDAU. We—State Farm I don't believe actually made a formal presentation.

Mr. SAWYER. You did not make a formal presentation?

Mr. BRANDAU. On 109.

Mr. SAWYER. The reason I ask you that is that it seems to me that we ought to have a better way to make use of claims data; that there is a data stream out there that is getting lost in the blizzard, and it takes a special effort to ferret out the meaningful information within lots of data. And it seems to me that it would be worthwhile for us to take a look at not only what and how information is collected, but definitions of events and to understand how they are tabulated. The effort that was made to isolate site of manufacture appears to have a significant role in the events that we have experienced in the last few years.

The ability to do that, it seems to me, is not a formal part of the 109 standards, but perhaps ought to be, and I would hope that at some point you could give some thought to that. You encounter those data in meaningful ways and I think that would be useful.

Mr. Ditlow, you mentioned something that I think is enormously important, that with the Firestone 500, the numbers were much larger, the consequences were not so great. The notion of a 1 percent threshold appears to begin to lose its meaning in the light of the change between what happened in 1977 and 1978 and what happened in the course of the last couple of years.

It seems to me that we need to figure out how best to quantify the catastrophic nature of a series of events; that it is not simply enough to speak of those in subjective terms, but that we ought to be able to measure it, because that simple absolute black-and-white bright line threshold may not tell us all that we need to know about the consequences of a series of events.

Could you comment on that?

Mr. DITLOW. That is correct. I mean, in many instances the finding of defects is almost an art, and there are no—and it is very hard to have a black or white line. But what you certainly need are mechanisms where the agency can become more prospective in minding these other data sources. I mean, State Farm Insurance Company in providing claims information to the agencies is really exemplary, and other insurers should follow that line. But we have to ask ourselves, what other data bases are not being tapped?

We heard reference to the Fatal Accident Reporting System here earlier in these hearings, and the agency traditionally does not look at the Fatal Accident Reporting System until after an investigation is opened. And they should look at it beforehand. We have a National Accident Sampling System. So part of the message to the agency is to figure out what data sources are out there and to make sure that you utilize what is available, because an underutilized data source is a lot cheaper than developing a new one.

Mr. SAWYER. Coming together and finding ways that we can all agree and to quantify that.

Mr. DITLOW. Well, if you want to quantify it, what I would do is any—if you have a death accident, it should be reported. If you have a death failure involving a tire, that should be reported to the agency by the company, not just as a safety defect, but just as an early warning. If the adjustments rates—and what type of adjustments we are looking at. If you have tread separations, those are more important than wear-out mechanisms or chunks. So you have to—so I would like to sit down and work with the agency to develop this type of thing. But until now, the agency hasn't been focused on trying to develop that filter.

Mr. SAWYER. Thank you very much, Mr. Chairman.

Mr. TAUZIN. Thank you, Tom.

The Chair recognizes the gentleman from Tennessee, Mr. Bryant.

Mr. BRYANT. Thank you. I thank the panel. I thank especially the representatives from State Farm as well as your company for providing this great effort here. I think we are all tired; I think most of the questions have already been asked and I think there are probably a few left, but I am going to leave those to my colleagues and yield back my time.

Mr. TAUZIN. Thank you, Mr. Bryant.

The gentleman from North Carolina, Mr. Burr.

Mr. BURR. The gentleman from Tennessee surprised me. I was sitting here, trying to add up my premiums to State Farm to see if I paid for the trip I took, and I think clearly you could make the trip a couple of times, and we are probably indicative of your 1 out of 5 number on autos as well.

Let me just ask you about that. You just simply, because of the sheer numbers of automobiles that you insure, could be and probably are a tremendous resource to NHTSA. Would that be an accurate statement?

Mr. BOYDEN. I would say so.

Mr. BURR. Would it be safe to assume that State Farm's relationship with NHTSA is very close?

Mr. BRANDAU. Yes, it is very close, not only in terms of what Sam does with NHTSA, but we also cooperate with NHTSA on a number of safety programs. We are working very closely with them on the airbag safety campaign. So, through the years, we have had very good relationships with NHTSA. We look to NHTSA as the primary safety agency on auto safety, and in very many arenas we work with them. So we try to keep a very positive relationship with NHTSA.

Mr. BURR. So I would take for granted, Sam, when you contact them, this is not an unusual thing for you to pass on some tidbit of information that maybe you pick up from the State Farm data base with or without identifiers and in most cases I am sure they are without identifiers, but the raw information. That is not unusual for somebody on the other end to receive a phone call and an e-mail follow-up from that?

Mr. BOYDEN. That is correct. As I mentioned, we work with them on 150 or more issues a year, different investigations and evaluations and such.

Mr. BURR. What, if anything, can you conclude from the fact that we even had a difficult time getting them to acknowledge that there was an original 1998 correspondence from you?

Mr. BOYDEN. I am speechless. I knew that they had the e-mail. I had spoken with individuals over time, and they had made me aware that they had the e-mail. I knew it was just a matter of locating it.

Mr. BURR. Did anybody from NHTSA ever follow back up with you, unsolicited by yourself, to see any update on the trend that you had identified?

Mr. BOYDEN. Yes. In April of this year, the investigator——

Mr. BURR. But, clearly, that was once there was a Houston TV expose, say, and Ford and Firestone and NHTSA began a much more intensive investigation.

Mr. BOYDEN. There was no initial contact prior to that.

Mr. BURR. When NHTSA made contact with you in April, did you have to re-create all of the information you had already supplied for them, or did you just pick up from the April 28—or the December 1999, phone call and give them what you had learned in the last 3 months?

Mr. BOYDEN. The July e-mail they had in hand at the time, so it was just updating from there and up to April of 2000.

Mr. BURR. So there was—after the July e-mail and the subsequent conversations that you had with them to update them on the numbers, that was not reflected in the information that they had in April of 2000 when they contacted you?

Mr. BOYDEN. I think they were aware that there were more numbers. I am not sure——

Mr. BURR. But nobody had bothered to write that down, to put that with the July, 1998, e-mail that you had sent them?

Mr. BOYDEN. I am not really sure on that.

Mr. BURR. I may have to go to Mr. Brandau on the—I am not a lawyer, but I am still trying to figure out the subrogation issue. Firestone told me earlier that they never made any reimbursements to State Farm for claims that you had paid for, your individuals that were insured that had loss, and you went back to Firestone because you thought it was the fault of the tire. Now, am I laying out the——

Mr. BRANDAU. I am not sure if that is what Firestone said, but I do know that we—at least in our headquarters, we do have indications of subrogation claims that we did have against Firestone. We don't have them all, but we know that we had at least six of the——

Mr. TAUZIN. Would the gentleman yield on that?

Mr. BURR. Clearly, I must have misunderstood.

Mr. TAUZIN. I think there was confusion in the testimony, and perhaps we can get it straight. What I understood Firestone to say was that they had never struck a deal or an agreement with State Farm on the issue of the——

Mr. BURR. The gentleman is correct.

Mr. TAUZIN. But they did settle individual subrogation claims.

Mr. BURR. I used the word settlement, and I think that that probably was the buzzword that they didn't want to agree to.

Mr. TAUZIN. But we have a document indicating a number of subrogation settlements.

Mr. BRANDAU. Yes, we did have a number of settlements that we knew of and I am sure somewhere out in the field on individual cases.

Mr. BURR. From the standpoint of State Farm or any insurer, when a company agrees to that subrogation, State Farm would then drop it, am I correct? They are reimbursed?

Mr. BRANDAU. Yes, we are reimbursed.

Mr. BURR. And part of that agreement is that they don't accept any blame or liability; they are just paying off the claim?

Mr. BRANDAU. That is usually what it says. But to the best of our knowledge, also, we had no confidentiality arrangement with Firestone, at least the ones that we have looked at at State Farm, so we were free to mention it as we have to this committee. So when you say we dropped it, we recovered our losses, but we certainly kept it in our central unit at State Farm, and it was something that we certainly used in terms of looking at trends.

Mr. BOYDEN. It is not only returning our losses, it is also returning the policyholder's deductible. It is a requirement, sir.

Mr. BURR. Mr. Chairman, I would ask if we don't have the information as far as the number of claims that were subrogated, what they can legally provide for us I hope that they would.

Mr. TAUZIN. I think we already have that information.

Mr. BRANDAU. I think we have given you at least a summary of the information.

Mr. TAUZIN. State Farm—I mean Firestone also agreed, as I understood their testimony, to supply us with information as to any findings by experts on the question of defects that are part of these claims or lawsuits.

Mr. BURR. I thank the Chair.

Mr. TAUZIN. I thank the gentleman.

The gentleman from Illinois, Mr. Shimkus.

Mr. SHIMKUS. Thank you, Mr. Chairman.

My colleagues have done a good job of describing the virtues of an Illinois company and an Illinois citizen, and one of the reasons I am staying so long is to make sure that that is done. Illinois is a great insurance State because we don't regulate the price. Our insurance commissioners, they let the market set the price, and that is why we are a very good insurance State, and we are proud of companies like State Farm.

On the subrogation issue, I mentioned this to Dr. Bailey and the whole idea of connecting the dots and more information. That information was never forwarded to NHTSA, though, am I correct?

Mr. BRANDAU. Not the subrogation issue.

Mr. SHIMKUS. Not the subrogation. Had it been, it would still even make more of a compelling case, Mr. Boyden, don't you agree, to NHTSA?

Mr. BOYDEN. I believe so. I can't swear to it, but I believe when they open a PE level—I have had contact where they have gotten copies of our subrogation information, and I think it is on a PE level, and then the manufacturer forwards that to NHTSA.

Mr. SHIMKUS. I will defer to you.

The last thing I want to ask Mr. Ditlow. Another thing I brought up earlier was gathering this information, you know, who is the keeper—NHTSA, a third party interest, public interest group, or an industry-led——

Mr. DITLOW. Are we talking about the information being provided by the auto and the tire companies?

Mr. SHIMKUS. Right.

Mr. DITLOW. Yes. If it just went to NHTSA, that would be fine; and it would be collected there at the agency. We would, as a public interest watchdog——

Mr. SHIMKUS. Let me interrupt. If we could be assured that NHTSA would respond with good intentions, I mean, we just had a case of information being forwarded and no response.

Mr. DITLOW. Right.

Mr. SHIMKUS. There are people who trust third-party interest groups more than they trust government, and there are some people who trust government more than they trust corporate America. So the point is, somewhere, a gathering of more information, a bigger data base, and I am not one—I hope NHTSA could redeem itself like maybe some entities in corporate America and gather the trust, but, in this case, they have failed. So I am not ready to give them the good seal of approval that they should be the stewards of the information.

Mr. DITLOW. Well, what I would recommend is one of two things. Either, A, you do, in fact, give it to an independent body as you suggest; or, B, if you do give it to NHTSA, that you make it available to watchdog outsiders like ourselves. Because worst of all situations is that—and much of the information that goes to NHTSA today is kept behind closed doors. We can't get access to it.

A real simple example of that is that we used to be able to get complete access to consumer complaints at NHTSA, and most tire complaints in this country don't have that tire ID number on it. So we used to call them up when we did the Firestone 500 and say, what is the tire ID number on this tire? What is the brand? We can't do that now because NHTSA keeps it confidential and only gives it to the tire manufacturer or the auto manufacturer to a check-off box that they have on the complaint. So we have lost the ability to watchdog the agency on these complaints that they receive.

Mr. SHIMKUS. Mr. Chairman, if I may, on the opening up of the new tire standards which has been suggested, would that also bring into account a question of a previous point that I made about addressing the nylon cap issue?

Mr. DITLOW. I am sorry, I thought you were asking State Farm.

Mr. SHIMKUS. Well, I am just asking the panel.

Mr. DITLOW. Okay. I think at the eleventh hour, I am a little tired.

Mr. SHIMKUS. I think we all are. The nylon cap was discussed earlier as far as changing standards. If we opened up, as I understand, 109, which is the 1968 tire standard, that would call industry and would at least raise the issue of whether we wanted to go or look at using nylon caps to prohibit tire separation. Is that a good follow-on analysis of what could happen?

Mr. DITLOW. Well, if you opened up 109 and you significantly upgraded it, say, for example x, I would suggest not only running the test at the recommended air pressure like 26, if that is what it is, but drop it down to 04 pound to represent actually what happens out there in the field as part of the test. My judgment is that if you have tough performance standards the nylon cap would be a result of that performance standard.

Mr. SHIMKUS. Thank you very much.

Thank you, Mr. Chairman. I yield back.

Mr. TAUZIN. Thank you, Mr. Shimkus.

I think, unless Mr. Rogan has a question——

Mr. ROGAN. I have no questions.

Mr. TAUZIN. That concludes the questioning.

Let me beg your indulgence just for a second. We were just discussing the fact that many of the questions that are being asked right now, how information collected in organizations such as State Farm might properly find its way into the right data banks and be paid enough attention so that it has an impact upon safety decisions made by the agency and recalls, if necessary, of unsafe products—it occurred to us that we are still talking about collecting information about failures that have already occurred. We are still talking about a system that depends upon people getting hurt and injured before it gets to anybody's attention that there is a defect in a product in the marketplace. I would hope we also turn a lot of our attention to the question of how we might devise standards and testing in advance of products going into the marketplace so that we don't have to rely upon deaths and injuries to occur in order to effectuate recalls or other safety actions.

I am harkening way back now to my days at what we call Nicholls State Harvard on the Bayou in Louisiana, a little university where I went to school, but I remember studying Greek mythology and, if I recall properly, two brothers named Prometheus and Epimetheus. Prometheus was the one that was punished for giving fire to man, and the gods punished him I think by tieing him to a tree where vultures ate out his heart every night, pretty gruesome stuff.

But he was blessed, Prometheus. He and his brother were both blessed with gifts, as I recall. Prometheus had a marvelous gift. It was the gift of foresight. He could see into the future. He could see what was going to happen. And while it is a gift, it is a horrible gift in some ways, because how many of us would really want to know what is going to happen tomorrow and the rest of our lives? But, nevertheless, it is quite a fascinating gift, to be able to see in advance and, therefore, avoid risk and injury and death.

Epimetheus, on the other hand, was gifted with hindsight. He could see beautifully what had happened yesterday.

Unfortunately, we are dealing with a lot of hindsight today, and we have learned a lot, and I think we have all learned a lot about what happened and in retrospect what could have happened. As Mr. Nasser himself said, he regrets so horribly that he didn't ask the right questions sooner. And I am sure that Firestone regrets that it didn't see these trends developing sooner and understand them; and I am sure NHTSA regrets that it didn't pay attention to the information you provided for them, Mr. Boyden, at a critical time.

But this committee has to move from this position of examining what happened yesterday to thinking about what should happen tomorrow, and we have to call upon perhaps the Almighty for some inspiration here and to each other's intellect for some guidance. So I ask you, as I will ask Firestone and Ford and NHTSA and all of my colleagues, to think this through after this hearing today. This has been a long but incredibly instructional hearing I know for all of us and for the American public. The next job is to follow up on this hearing to make sure we have all of the facts, that nothing is hidden, that the light shines on what happened yesterday, and then to learn from it and devise a policy to ensure that it doesn't happen tomorrow.

I hope we build a policy built upon preventing products from entering the marketplace that are unsafe because we properly tested them in the beginning rather than depending upon a system, even as good as yours, to detect the trends of injury and death that tell us the product should have never been there in the first place.

I want to particularly thank, as we conclude the hearing, Joe Greenman, Charles Symington, Tom DiLenge, Mark Paoletta, Jan Faiks and Ann Washington, and all of the staff of my good friend, Mr. Upton, of the Oversight and Investigation Subcommittee and the Commerce Committee for the extraordinary work they did compiling this incredible volume of documents and information that formed the background of this committee.

To all of you who spent long hours and traveled around the country—indeed, I did not mention the minority staff. I should properly mention them. I don't have all of your names, and I apologize, but it was a combination of majority and minority staff who traveled around the country gathering this information, and I want to thank all of you. I apologize for not knowing all of the names of the minority who assisted, but I will make sure that is entered into the record today.

This is not the end of this investigation, this is just the beginning, and when we conclude it I hope our committee will make some recommendations not just to NHTSA but to the industries and perhaps even to the full Congress on how we can build a policy that, as Mr. Rush said, does not see this repeated over and over again. Thank you very much for your attendance, your patience and your contributions.

Mr. Upton.

Mr. UPTON. Mr. Chairman, I just might add a 30-second appreciation to the staff as well. These hearings don't just happen. For many of us, the issue came to us while we were at home during the August break; and for this hearing to start literally before Congress came back into session today and finished after 11 o'clock took a lot of hard time and a lot of terrific staff, both personal staff as well as committee staff, to get witnesses lined up, help us with questions, go over some of the testimony. And we couldn't have done it without them, obviously.

I want to thank all of my colleagues. A lot of hearings like this, you don't see this many members here, particularly lasting 10½ hours, 11 hours now. So I want to thank you, Chairman Tauzin, for your commitment. This is not the end. It is, sadly, the beginning, but we want to make sure that we don't have future instances like this ever again.

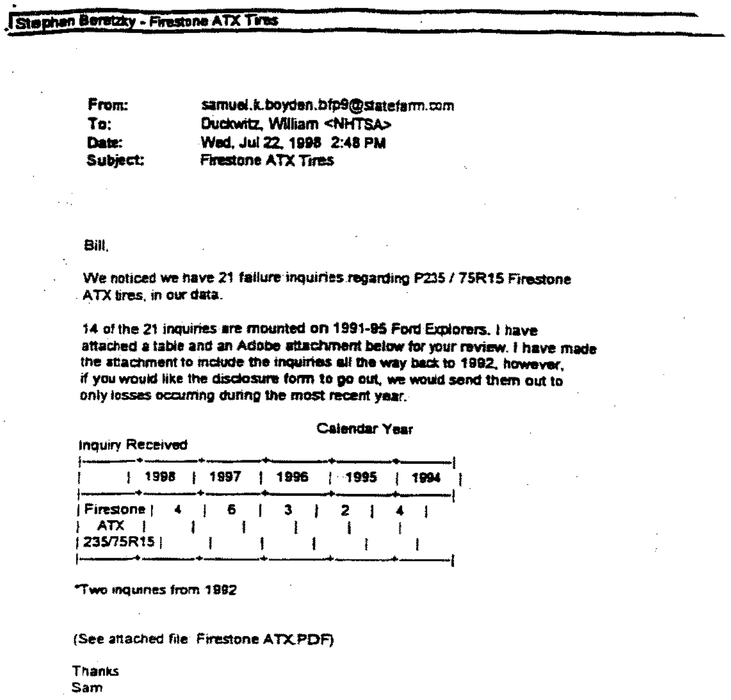
Thank you.

Mr. TAUZIN. Mr. Upton, before we leave, let me mention the minority staffers—Edith Holleman, Bruce Gwinn and Brandan Kelsay—for the extraordinary contributions they made. This has been indeed a bipartisan effort, and it continues to be and will continue to be until we resolve this issue.

Thank you so much for your attendance. The hearing stands adjourned.

[Whereupon, at 11:21 p.m., the subcommittees were adjourned.]

[Additional material submitted for the record follows:]



Stephen Beretzky - Firestone ATX Tires

From: samuel.k.boyden.bfp9@statefarm.com
To: Duckwitz, William <NHTSA>
Date: Wed, Jul 22, 1998 2:48 PM
Subject: Firestone ATX Tires

Bill,

We noticed we have 21 failure inquiries regarding P235 / 75R15 Firestone ATX tires, in our data.

14 of the 21 inquiries are mounted on 1991-95 Ford Explorers. I have attached a table and an Adobe attachment below for your review. I have made the attachment to include the inquiries all the way back to 1992, however, if you would like the disclosure form to go out, we would send them out to only losses occurring during the most recent year.

Calendar Year

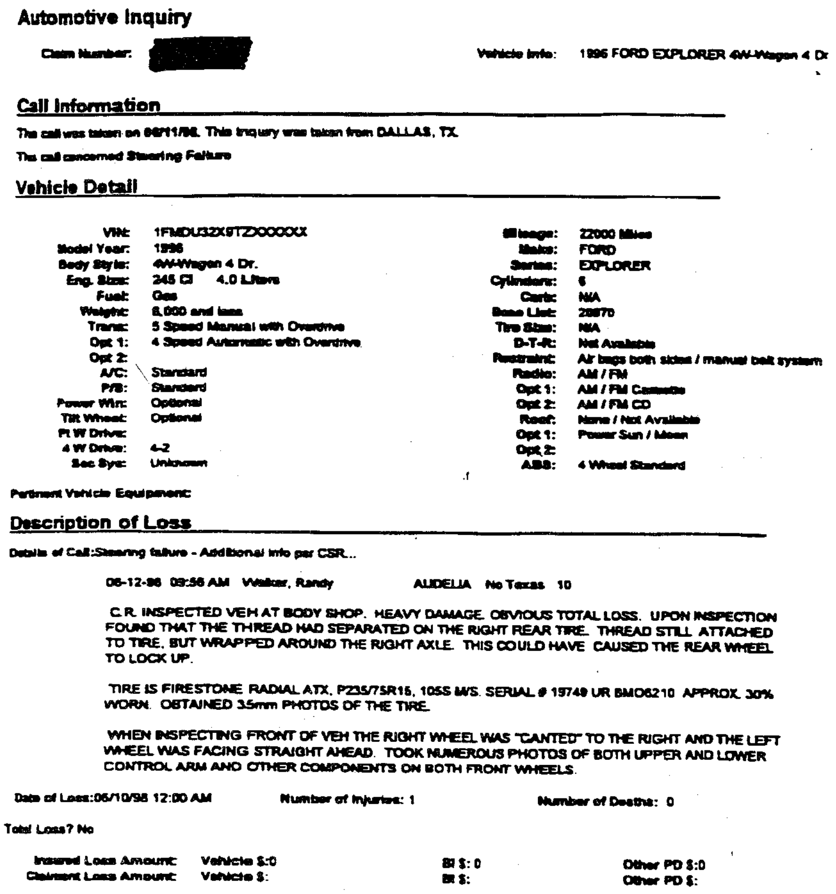
Inquiry Received

	1998	1997	1996	1995	1994
Firestone ATX 235/75R15	4	6	3	2	4

*Two inquiries from 1992

(See attached file Firestone ATX.PDF)

Thanks
Sam



Automotive Inquiry

Claim Number: [redacted] **Vehicle Info:** 1996 FORD EXPLORER 4W-Wagon 4 Dr

Call Information

The call was taken on 06/11/98. This inquiry was taken from DALLAS, TX.

The call concerned Steering Failure

Vehicle Detail

VIN:	1FMDU32X9TZXXXXXX	**Mileage:**	22000 Miles
Model Year:	1996	**Make:**	FORD
Body Style:	4W-Wagon 4 Dr.	**Series:**	EXPLORER
Eng. Size:	245 CI 4.0 Liters	**Cylinders:**	6
Fuel:	Gas	**Carb:**	N/A
Weight:	6,000 and less	**Base List:**	20970
Trans:	5 Speed Manual with Overdrive	**Tire Size:**	N/A
Opt 1:	4 Speed Automatic with Overdrive	**D-T-R:**	Not Available
Opt 2:		**Restraint:**	Air bags both sides / manual belt system
A/C:	Standard	**Radio:**	AM / FM
P/S:	Standard	**Opt 1:**	AM / FM Cassette
Power Win:	Optional	**Opt 2:**	AM / FM CD
Tilt Wheel:	Optional	**Roof:**	None / Not Available
Ft W Drive:		**Opt 1:**	Power Sun / Moon
4 W Drive:	4-2	**Opt 2:**	
Sec Sys:	Unknown	**ABS:**	4 Wheel Standard

Pertinent Vehicle Equipment:

Description of Loss

Details of Call: Steering failure - Additional info per CSR...

06-12-98 09:56 AM Walker, Randy AUDELIA No Texas 10

C.R. INSPECTED VEH AT BODY SHOP. HEAVY DAMAGE. OBVIOUS TOTAL LOSS. UPON INSPECTION FOUND THAT THE THREAD HAD SEPARATED ON THE RIGHT REAR TIRE. THREAD STILL ATTACHED TO TIRE, BUT WRAPPED AROUND THE RIGHT AXLE. THIS COULD HAVE CAUSED THE REAR WHEEL TO LOCK UP.

TIRE IS FIRESTONE RADIAL ATX, P235/75R15, 105S M/S. SERIAL # 19749 UR 8MO6210 APPROX. 30% WORN. OBTAINED 35mm PHOTOS OF THE TIRE.

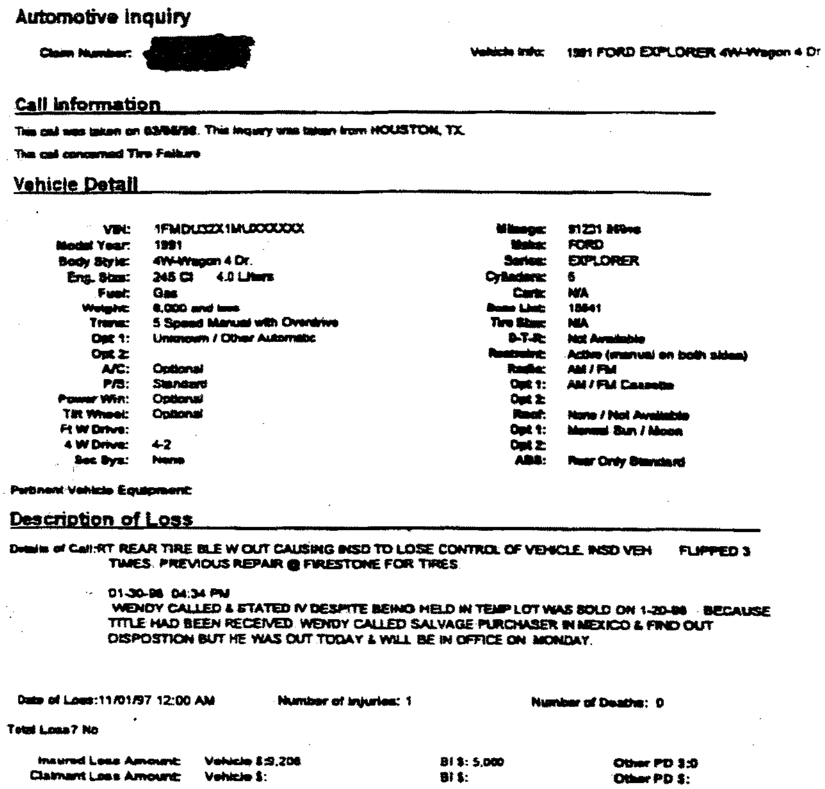
WHEN INSPECTING FRONT OF VEH THE RIGHT WHEEL WAS "CANTED" TO THE RIGHT AND THE LEFT WHEEL WAS FACING STRAIGHT AHEAD. TOOK NUMEROUS PHOTOS OF BOTH UPPER AND LOWER CONTROL ARM AND OTHER COMPONENTS ON BOTH FRONT WHEELS.

Date of Loss: 06/10/98 12:00 AM **Number of Injuries:** 1 **Number of Deaths:** 0

Total Loss? No

Insured Loss Amount:	Vehicle $:0	BI $: 0	Other PD $:0
Claimant Loss Amount:	Vehicle $:	BI $:	Other PD $:

REDACTED



Automotive Inquiry

Claim Number: [redacted] **Vehicle Info:** 1991 FORD EXPLORER 4W-Wagon 4 Dr

Call Information

This call was taken on 03/06/98. This inquiry was taken from HOUSTON, TX.

This call concerned Tire Failure

Vehicle Detail

VIN:	1FMDU32X1MUXXXXXX	**Mileage:**	91231 Miles
Model Year:	1991	**Make:**	FORD
Body Style:	4W-Wagon 4 Dr.	**Series:**	EXPLORER
Eng. Size:	245 CI 4.0 Liters	**Cylinders:**	6
Fuel:	Gas	**Carb:**	N/A
Weight:	6,000 and less	**Base List:**	18541
Trans:	5 Speed Manual with Overdrive	**Tire Size:**	N/A
Opt 1:	Unknown / Other Automatic	**B-T-R:**	Not Available
Opt 2:		**Restraint:**	Active (manual on both sides)
A/C:	Optional	**Radio:**	AM / FM
P/S:	Standard	**Opt 1:**	AM / FM Cassette
Power Win:	Optional	**Opt 2:**	
Tilt Wheel:	Optional	**Roof:**	None / Not Available
Ft W Drive:		**Opt 1:**	Manual Sun / Moon
4 W Drive:	4-2	**Opt 2:**	
Sec Sys:	None	**ABS:**	Rear Only Standard

Pertinent Vehicle Equipment:

Description of Loss

Details of Call: RT REAR TIRE BLE W OUT CAUSING INSD TO LOSE CONTROL OF VEHICLE. INSD VEH FLIPPED 3 TIMES. PREVIOUS REPAIR @ FIRESTONE FOR TIRES.

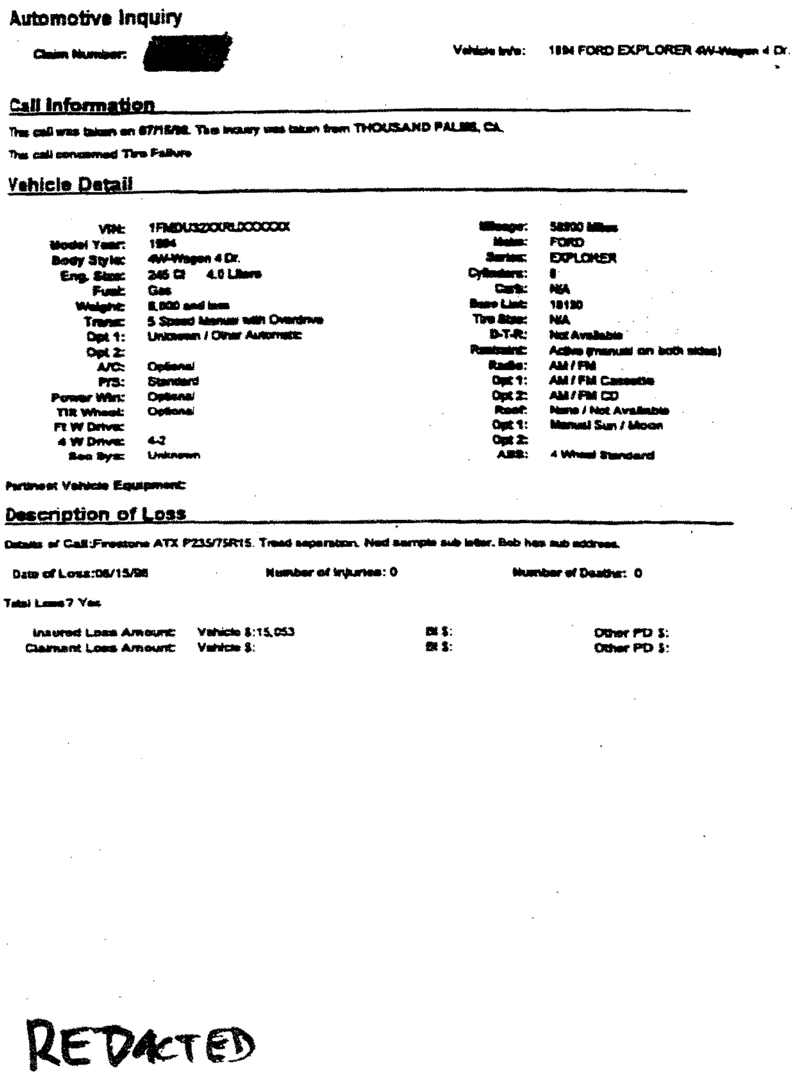
01-30-98 04:34 PM
WENDY CALLED & STATED IV DESPITE BEING HELD IN TEMP LOT WAS SOLD ON 1-20-98 BECAUSE TITLE HAD BEEN RECEIVED. WENDY CALLED SALVAGE PURCHASER IN MEXICO & FIND OUT DISPOSTION BUT HE WAS OUT TODAY & WILL BE IN OFFICE ON MONDAY.

Date of Loss: 11/01/97 12:00 AM **Number of Injuries:** 1 **Number of Deaths:** 0

Total Loss? No

Insured Loss Amount:	**Vehicle $:** 9,208	**BI $:** 5,000	**Other PD $:** 0
Claimant Loss Amount:	**Vehicle $:**	**BI $:**	**Other PD $:**

REDACTED



Automotive Inquiry

Claim Number: [redacted]

Vehicle Info: 1994 FORD EXPLORER 4W-Wagon 4 Dr.

Call Information

The call was taken on 07/15/98. The inquiry was taken from THOUSAND PALMS, CA.

The call concerned Tire Failure

Vehicle Detail

VIN:	1FMDU32XXRUXXXXXX	Mileage:	58900 Miles
Model Year:	1994	Make:	FORD
Body Style:	4W-Wagon 4 Dr.	Series:	EXPLORER
Eng. Size:	245 CI 4.0 Liters	Cylinders:	6
Fuel:	Gas	Carb:	N/A
Weight:	6,000 and less	Base List:	18120
Trans:	5 Speed Manual with Overdrive	Tire Size:	N/A
Opt 1:	Unknown / Other Automatic	D-T-R:	Not Available
Opt 2:		Restraint:	Active (manual on both sides)
A/C:	Optional	Radio:	AM / FM
P/S:	Standard	Opt 1:	AM / FM Cassette
Power Win:	Optional	Opt 2:	AM / FM CD
T/R Wheel:	Optional	Roof:	None / Not Available
Ft W Drive:		Opt 1:	Manual Sun / Moon
4 W Drive:	4-2	Opt 2:	
Sec Sys:	Unknown	ABS:	4 Wheel Standard

Pertinent Vehicle Equipment:

Description of Loss

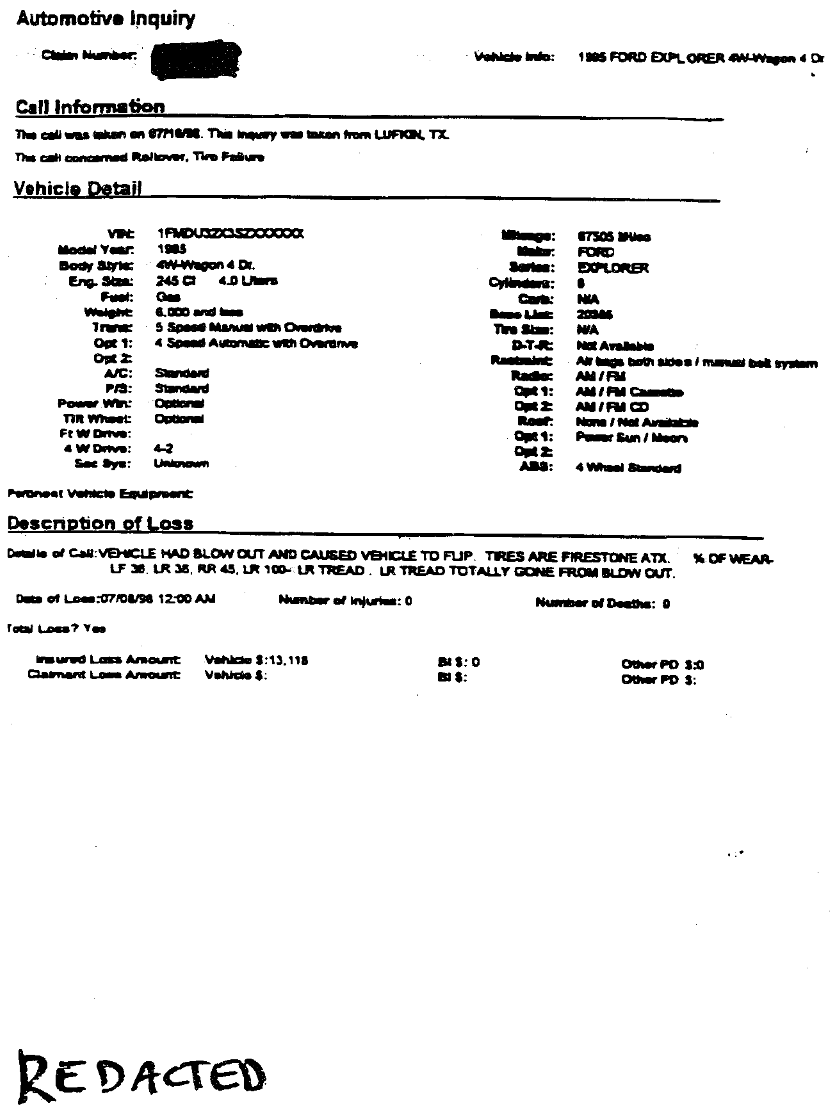
Details of Call:Firestone ATX P235/75R15. Tread separation. Need sample sub letter. Bob has sub address.

Date of Loss:06/15/98 Number of Injuries: 0 Number of Deaths: 0

Total Loss? Yes

Insured Loss Amount:	Vehicle $:15,053	BI $:	Other PD $:
Claimant Loss Amount:	Vehicle $:	BI $:	Other PD $:

REDACTED



Automotive Inquiry

Claim Number: [redacted] **Vehicle Info:** 1995 FORD EXPLORER 4W-Wagon 4 Dr

Call Information

The call was taken on 07/16/98. This inquiry was taken from LUFKIN, TX.

The call concerned Rollover, Tire Failure

Vehicle Detail

VIN:	1FMDU32X0SZXXXXXX	Mileage:	87505 Miles
Model Year:	1995	Make:	FORD
Body Style:	4W-Wagon 4 Dr.	Series:	EXPLORER
Eng. Size:	245 CI 4.0 Liters	Cylinders:	6
Fuel:	Gas	Carb:	N/A
Weight:	6,000 and less	Base List:	20345
Trans:	5 Speed Manual with Overdrive	Tire Size:	N/A
Opt 1:	4 Speed Automatic with Overdrive	D-T-R:	Not Available
Opt 2:		Restraint:	Air bags both sides / manual belt system
A/C:	Standard	Radio:	AM / FM
P/S:	Standard	Opt 1:	AM / FM Cassette
Power Win:	Optional	Opt 2:	AM / FM CD
Tilt Wheel:	Optional	Roof:	None / Not Available
Ft W Drive:		Opt 1:	Power Sun / Moon
4 W Drive:	4-2	Opt 2:	
Sec Sys:	Unknown	ABS:	4 Wheel Standard

Pertinent Vehicle Equipment:

Description of Loss

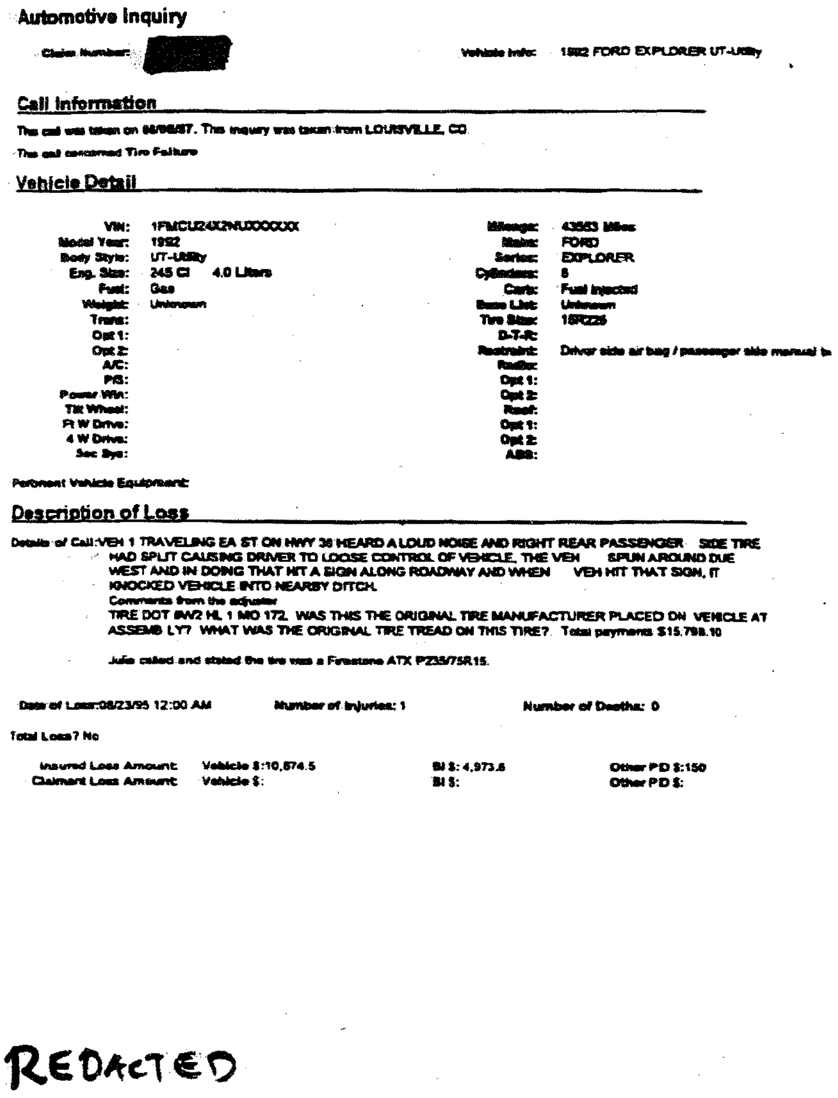
Details of Call: VEHICLE HAD BLOW OUT AND CAUSED VEHICLE TO FLIP. TIRES ARE FIRESTONE ATX. % OF WEAR-LF 38, LR 38, RR 45, LR 100- LR TREAD. LR TREAD TOTALLY GONE FROM BLOW OUT.

Date of Loss: 07/08/98 12:00 AM Number of Injuries: 0 Number of Deaths: 0

Total Loss? Yes

Insured Loss Amount:	Vehicle $:13,118	BI $: 0	Other PD $:0
Claimant Loss Amount:	Vehicle $:	BI $:	Other PD $:

REDACTED



Automotive Inquiry

Claim Number: [redacted] Vehicle Info: 1992 FORD EXPLORER UT-Utility

Call Information

This call was taken on 08/06/97. This inquiry was taken from LOUISVILLE, CO.

This call concerned Tire Failure

Vehicle Detail

VIN:	1FMCU24X2NUXXXXXX	Mileage:	43563 Miles
Model Year:	1992	Make:	FORD
Body Style:	UT-Utility	Series:	EXPLORER
Eng. Size:	245 CI 4.0 Liters	Cylinders:	6
Fuel:	Gas	Carb:	Fuel Injected
Weight:	Unknown	Base List:	Unknown
Trans:		Tire Size:	15R225
Opt 1:		D-T-R:	
Opt 2:		Restraint:	Driver side air bag / passenger side manual b
A/C:		Radio:	
P/S:		Opt 1:	
Power Win:		Opt 2:	
Tilt Wheel:		Roof:	
Ft W Drive:		Opt 1:	
4 W Drive:		Opt 2:	
Sec Sys:		ABS:	

Pertinent Vehicle Equipment:

Description of Loss

Details of Call: VEH 1 TRAVELING EA ST ON HWY 36 HEARD A LOUD NOISE AND RIGHT REAR PASSENGER SIDE TIRE HAD SPLIT CAUSING DRIVER TO LOOSE CONTROL OF VEHICLE, THE VEH SPUN AROUND DUE WEST AND IN DOING THAT HIT A SIGN ALONG ROADWAY AND WHEN VEH HIT THAT SIGN, IT KNOCKED VEHICLE INTO NEARBY DITCH.

Comments from the adjuster

TIRE DOT 8W2 HL 1 MO 172. WAS THIS THE ORIGINAL TIRE MANUFACTURER PLACED ON VEHICLE AT ASSEMB LY? WHAT WAS THE ORIGINAL TIRE TREAD ON THIS TIRE? Total payments $15,798.10

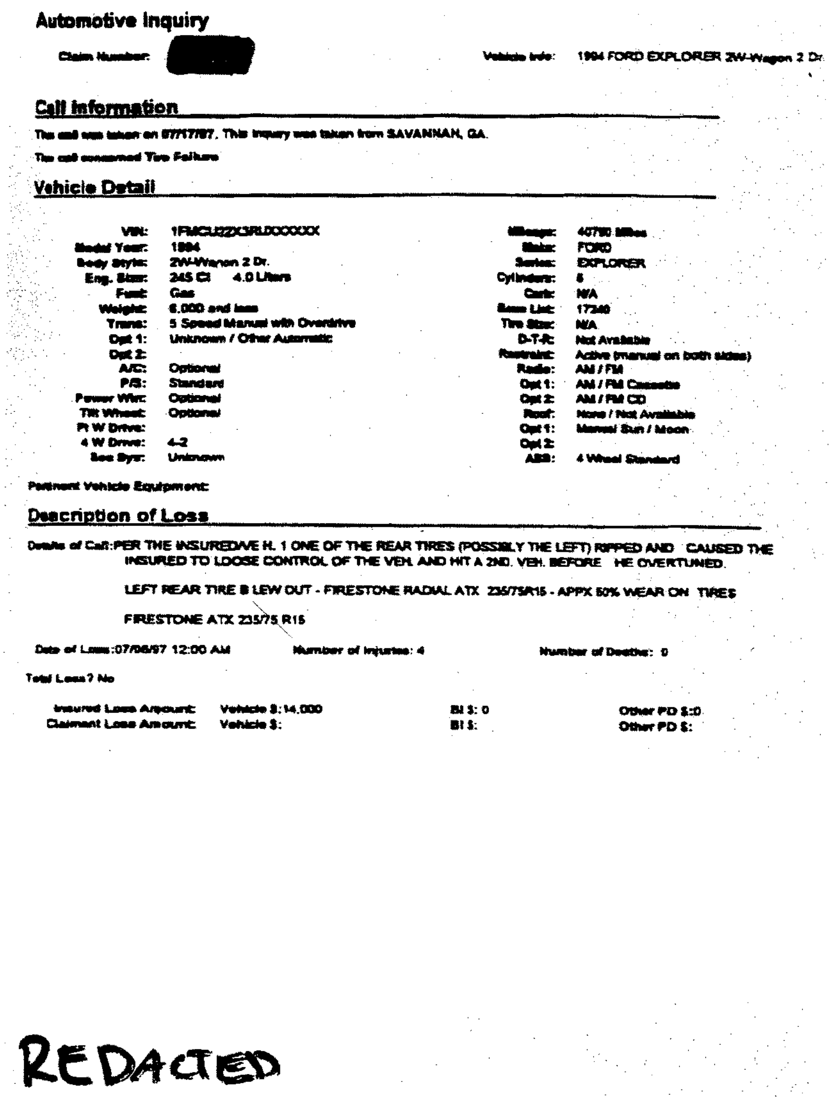
Julie called and stated the tire was a Firestone ATX P235/75R15.

Date of Loss: 08/23/95 12:00 AM Number of Injuries: 1 Number of Deaths: 0

Total Loss? No

Insured Loss Amount:	Vehicle $:10,674.5	BI $: 4,973.6	Other PD $:150
Claimant Loss Amount:	Vehicle $:	BI $:	Other PD $:

REDACTED



Automotive Inquiry

Claim Number: [redacted] **Vehicle Info:** 1994 FORD EXPLORER 2W-Wagon 2 Dr.

Call Information

The call was taken on 07/17/97. This inquiry was taken from SAVANNAH, GA.

The call concerned Tire Failure

Vehicle Detail

VIN:	1FMCU22X3RUXXXXXX	**Mileage:**	40790 Miles
Model Year:	1994	**Make:**	FORD
Body Style:	2W-Wagon 2 Dr.	**Series:**	EXPLORER
Eng. Size:	245 CI 4.0 Liters	**Cylinders:**	6
Fuel:	Gas	**Carb:**	N/A
Weight:	6,000 and less	**Base List:**	17240
Trans:	5 Speed Manual with Overdrive	**Tire Size:**	N/A
Opt 1:	Unknown / Other Automatic	**D-T-R:**	Not Available
Opt 2:		**Restraint:**	Active (manual on both sides)
A/C:	Optional	**Radio:**	AM / FM
P/S:	Standard	**Opt 1:**	AM / FM Cassette
Power Win:	Optional	**Opt 2:**	AM / FM CD
Tilt Wheel:	Optional	**Roof:**	None / Not Available
Ft W Drive:		**Opt 1:**	Manual Sun / Moon
4 W Drive:	4-2	**Opt 2:**	
Sec Sys:	Unknown	**ABS:**	4 Wheel Standard

Pertinent Vehicle Equipment:

Description of Loss

Details of Call: PER THE INSURED/VE H. 1 ONE OF THE REAR TIRES (POSSIBLY THE LEFT) RIPPED AND CAUSED THE INSURED TO LOOSE CONTROL OF THE VEH. AND HIT A 2ND. VEH. BEFORE HE OVERTUNED.

LEFT REAR TIRE B LEW OUT - FIRESTONE RADIAL ATX 235/75R15 - APPX 50% WEAR ON TIRES

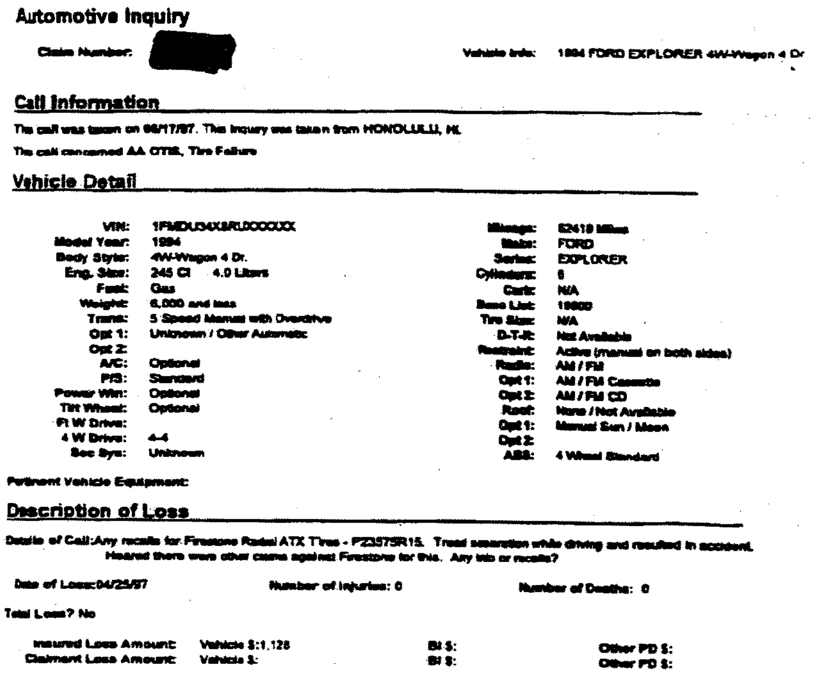
FIRESTONE ATX 235/75 R15

Date of Loss: 07/06/97 12:00 AM **Number of Injuries:** 4 **Number of Deaths:** 0

Total Loss? No

Insured Loss Amount:	**Vehicle $:** 14,000	**BI $:** 0	**Other PD $:** 0
Claimant Loss Amount:	**Vehicle $:**	**BI $:**	**Other PD $:**

REDACTED



Automotive Inquiry

Claim Number: [redacted]

Vehicle Info: 1994 FORD EXPLORER 4W-Wagon 4 Dr

Call Information

The call was taken on 06/17/97. This Inquiry was taken from HONOLULU, HI.

The call concerned AA OTIS, Tire Failure

Vehicle Detail

VIN:	1FMDU34X8RUXXXXXX	Mileage:	62419 Miles
Model Year:	1994	Make:	FORD
Body Style:	4W-Wagon 4 Dr.	Series:	EXPLORER
Eng. Size:	245 CI 4.0 Liters	Cylinders:	6
Fuel:	Gas	Carb:	N/A
Weight:	6,000 and less	Base List:	19800
Trans:	5 Speed Manual with Overdrive	Tire Size:	N/A
Opt 1:	Unknown / Other Automatic	D-T-R:	Not Available
Opt 2:		Restraint:	Active (manual on both sides)
A/C:	Optional	Radio:	AM / FM
P/S:	Standard	Opt 1:	AM / FM Cassette
Power Win:	Optional	Opt 2:	AM / FM CD
Tilt Wheel:	Optional	Roof:	None / Not Available
Ft W Drive:		Opt 1:	Manual Sun / Moon
4 W Drive:	4-4	Opt 2:	
Sec Sys:	Unknown	ABS:	4 Wheel Standard

Pertinent Vehicle Equipment:

Description of Loss

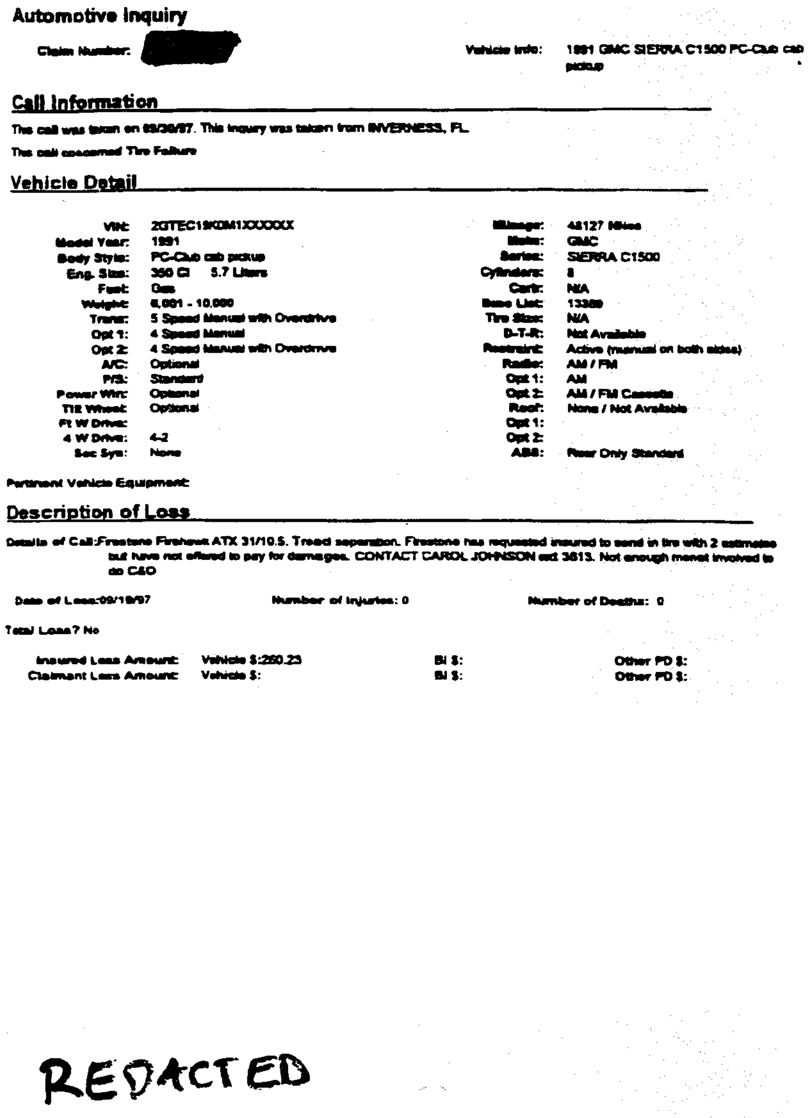
Details of Call: Any recalls for Firestone Radial ATX Tires - P23575R15. Tread separation while driving and resulted in accident. Heared there were other claims against Firestone for this. Any info or recalls?

Date of Loss: 04/25/97 Number of Injuries: 0 Number of Deaths: 0

Total Loss? No

Insured Loss Amount:	Vehicle $: 1,128	BI $:	Other PD $:
Claimant Loss Amount:	Vehicle $:	BI $:	Other PD $:

REDACTED



Automotive Inquiry

Claim Number: [redacted]

Vehicle info: 1991 GMC SIERRA C1500 PC-Club cab pickup

Call Information

This call was taken on 09/30/97. This inquiry was taken from INVERNESS, FL.

This call concerned Tire Failure

Vehicle Detail

VIN:	2GTEC19K0M1XXXXXX	**Mileage:**	48127 Miles
Model Year:	1991	**Make:**	GMC
Body Style:	PC-Club cab pickup	**Series:**	SIERRA C1500
Eng. Size:	350 CI 5.7 Liters	**Cylinders:**	8
Fuel:	Gas	**Carb:**	N/A
Weight:	8,001 - 10,000	**Base List:**	13369
Trans:	5 Speed Manual with Overdrive	**Tire Size:**	N/A
Opt 1:	4 Speed Manual	**D-T-R:**	Not Available
Opt 2:	4 Speed Manual with Overdrive	**Restraint:**	Active (manual on both sides)
A/C:	Optional	**Radio:**	AM / FM
P/S:	Standard	**Opt 1:**	AM
Power Win:	Optional	**Opt 2:**	AM / FM Cassette
Tilt Wheel:	Optional	**Roof:**	None / Not Available
Ft W Drive:		**Opt 1:**	
4 W Drive:	4-2	**Opt 2:**	
Sec Sys:	None	**ABS:**	Rear Only Standard

Pertinent Vehicle Equipment:

Description of Loss

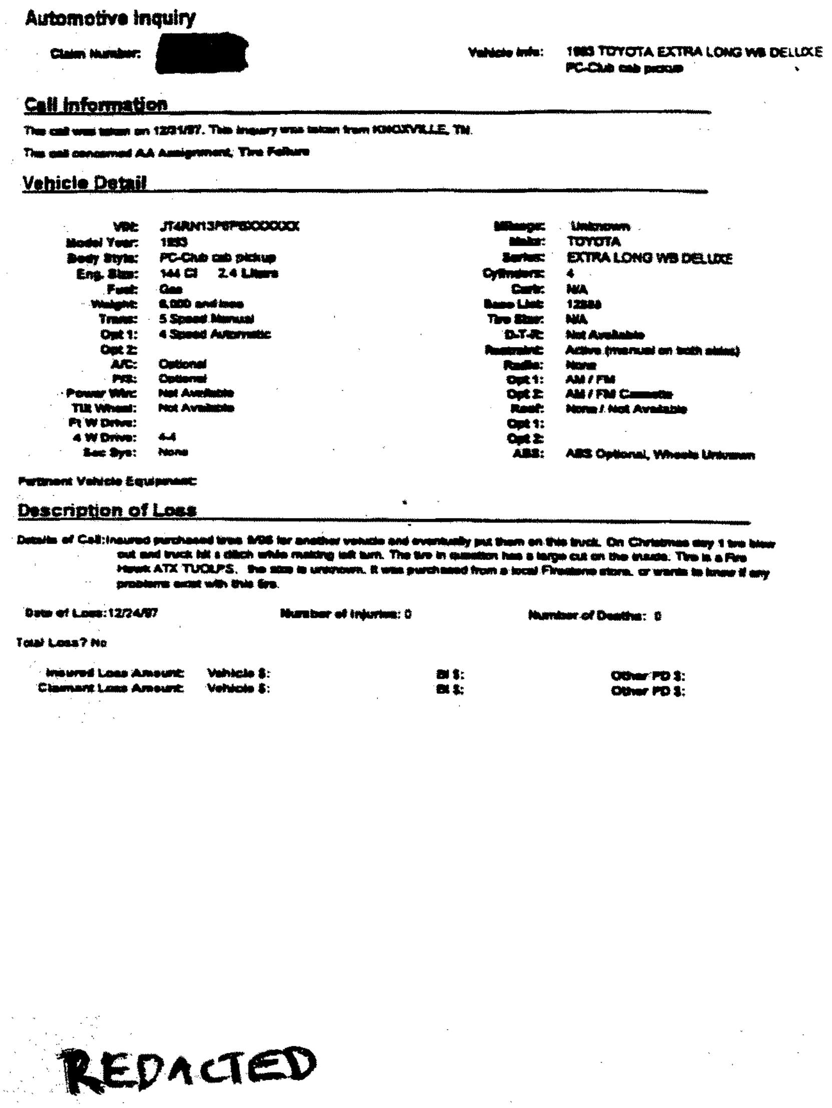
Details of Call: Firestone Firehawk ATX 31/10.5. Tread separation. Firestone has requested insured to send in tire with 2 estimates but have not offered to pay for damages. CONTACT CAROL JOHNSON ext 3613. Not enough money involved to do C&O

Date of Loss: 09/19/97 **Number of Injuries:** 0 **Number of Deaths:** 0

Total Loss? No

Insured Loss Amount:	Vehicle $:260.23	BI $:	Other PD $:
Claimant Loss Amount:	Vehicle $:	BI $:	Other PD $:

REDACTED



Automotive Inquiry

Claim Number: [redacted]

Vehicle Info: 1993 TOYOTA EXTRA LONG WB DELUXE PC-Club cab pickup

Call Information

This call was taken on 12/31/97. This inquiry was taken from KNOXVILLE, TN.

This call concerned AA Assignment, Tire Failure

Vehicle Detail

VIN:	JT4RN13P6PSXXXXXX	**Mileage:**	Unknown
Model Year:	1993	**Make:**	TOYOTA
Body Style:	PC-Club cab pickup	**Series:**	EXTRA LONG WB DELUXE
Eng. Size:	144 CI 2.4 Liters	**Cylinders:**	4
Fuel:	Gas	**Carb:**	N/A
Weight:	6,000 and less	**Base List:**	12886
Trans:	5 Speed Manual	**Tire Size:**	N/A
Opt 1:	4 Speed Automatic	**D-T-R:**	Not Available
Opt 2:		**Restraint:**	Active (manual on both sides)
A/C:	Optional	**Radio:**	None
P/S:	Optional	**Opt 1:**	AM / FM
Power Win:	Not Available	**Opt 2:**	AM / FM Cassette
Tilt Wheel:	Not Available	**Roof:**	None / Not Available
Ft W Drive:		**Opt 1:**	
4 W Drive:	4-4	**Opt 2:**	
Sec Sys:	None	**ABS:**	ABS Optional, Wheels Unknown

Pertinent Vehicle Equipment:

Description of Loss

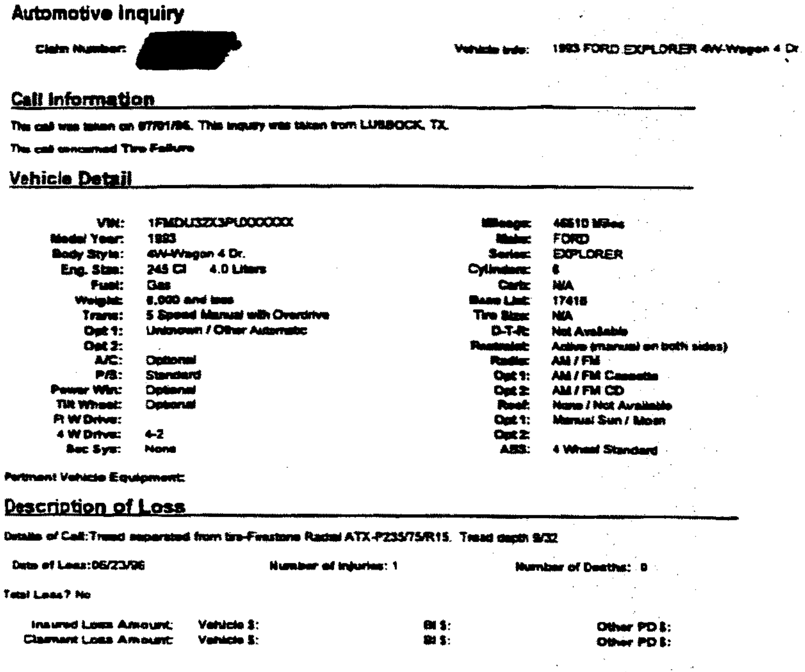
Details of Call: Insured purchased tires 9/96 for another vehicle and eventually put them on this truck. On Christmas day 1 tire blew out and truck hit a ditch while making left turn. The tire in question has a large cut on the inside. Tire is a Fire Hawk ATX TUOLPS. the size is unknown. It was purchased from a local Firestone store. cr wants to know if any problems exist with this tire.

Date of Loss: 12/24/97 **Number of Injuries:** 0 **Number of Deaths:** 0

Total Loss? No

Insured Loss Amount:	**Vehicle $:**	**BI $:**	**Other PD $:**
Claimant Loss Amount:	**Vehicle $:**	**BI $:**	**Other PD $:**

REDACTED



Automotive Inquiry

Claim Number: [redacted]

Vehicle Info: 1993 FORD EXPLORER 4W-Wagon 4 Dr

Call Information

The call was taken on 07/01/96. This inquiry was taken from LUBBOCK, TX.

The call concerned Tire Failure

Vehicle Detail

VIN:	1FMDU32X3PL000000X	Mileage:	46510 Miles
Model Year:	1993	Make:	FORD
Body Style:	4W-Wagon 4 Dr.	Series:	EXPLORER
Eng. Size:	245 CI 4.0 Liters	Cylinders:	6
Fuel:	Gas	Carb:	N/A
Weight:	6,000 and less	Base List:	17418
Trans:	5 Speed Manual with Overdrive	Tire Size:	N/A
Opt 1:	Unknown / Other Automatic	D-T-R:	Not Available
Opt 2:		Restraint:	Active (manual) on both sides)
A/C:	Optional	Radio:	AM / FM
P/S:	Standard	Opt 1:	AM / FM Cassette
Power Win:	Optional	Opt 2:	AM / FM CD
Tilt Wheel:	Optional	Roof:	None / Not Available
Ft W Drive:		Opt 1:	Manual Sun / Moon
4 W Drive:	4-2	Opt 2:	
Sec Sys:	None	ABS:	4 Wheel Standard

Pertinent Vehicle Equipment:

Description of Loss

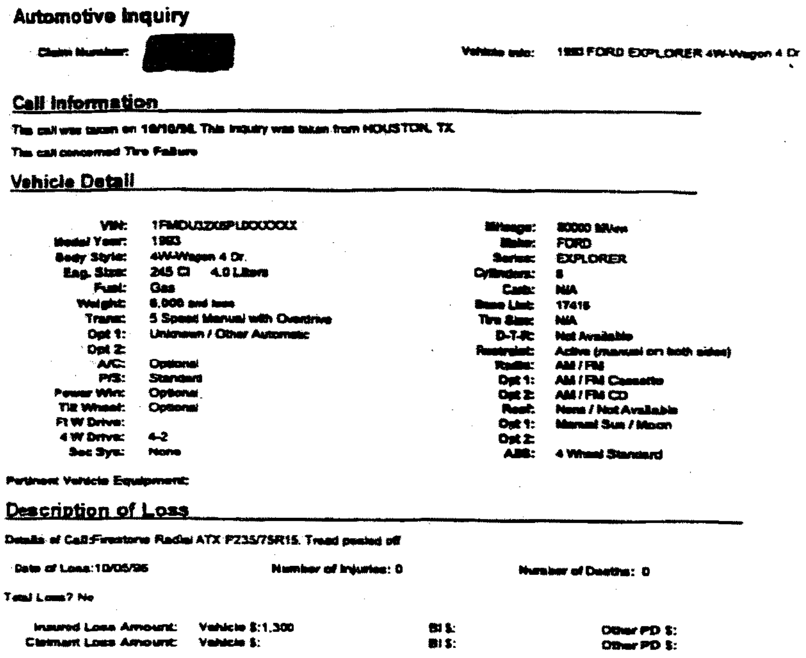
Details of Call: Tread separated from tire-Firestone Radial ATX-P235/75/R15. Tread depth 9/32

Date of Loss: 06/23/96 Number of Injuries: 1 Number of Deaths: 0

Total Loss? No

Insured Loss Amount:	Vehicle $:	BI $:	Other PD $:
Claimant Loss Amount:	Vehicle $:	BI $:	Other PD $:

REDACTED



Automotive Inquiry

Claim Number: [redacted]

Vehicle info: 1993 FORD EXPLORER 4W-Wagon 4 Dr

Call Information

The call was taken on 10/10/96. This inquiry was taken from HOUSTON, TX.

The call concerned Tire Failure

Vehicle Detail

VIN:	1FMDU32X0PLXXXXXX	Mileage:	80000 Miles
Model Year:	1993	Make:	FORD
Body Style:	4W-Wagon 4 Dr.	Series:	EXPLORER
Eng. Size:	245 CI 4.0 Liters	Cylinders:	6
Fuel:	Gas	Carb:	N/A
Weight:	6,000 and less	Base List:	17415
Trans:	5 Speed Manual with Overdrive	Tire Size:	N/A
Opt 1:	Unknown / Other Automatic	D-T-R:	Not Available
Opt 2:		Restraint:	Active (manual on both sides)
A/C:	Optional	Radio:	AM / FM
P/S:	Standard	Opt 1:	AM / FM Cassette
Power Win:	Optional	Opt 2:	AM / FM CD
Tilt Wheel:	Optional	Roof:	None / Not Available
Ft W Drive:		Opt 1:	Manual Sun / Moon
4 W Drive:	4-2	Opt 2:	
Sec Sys:	None	ABS:	4 Wheel Standard

Pertinent Vehicle Equipment:

Description of Loss

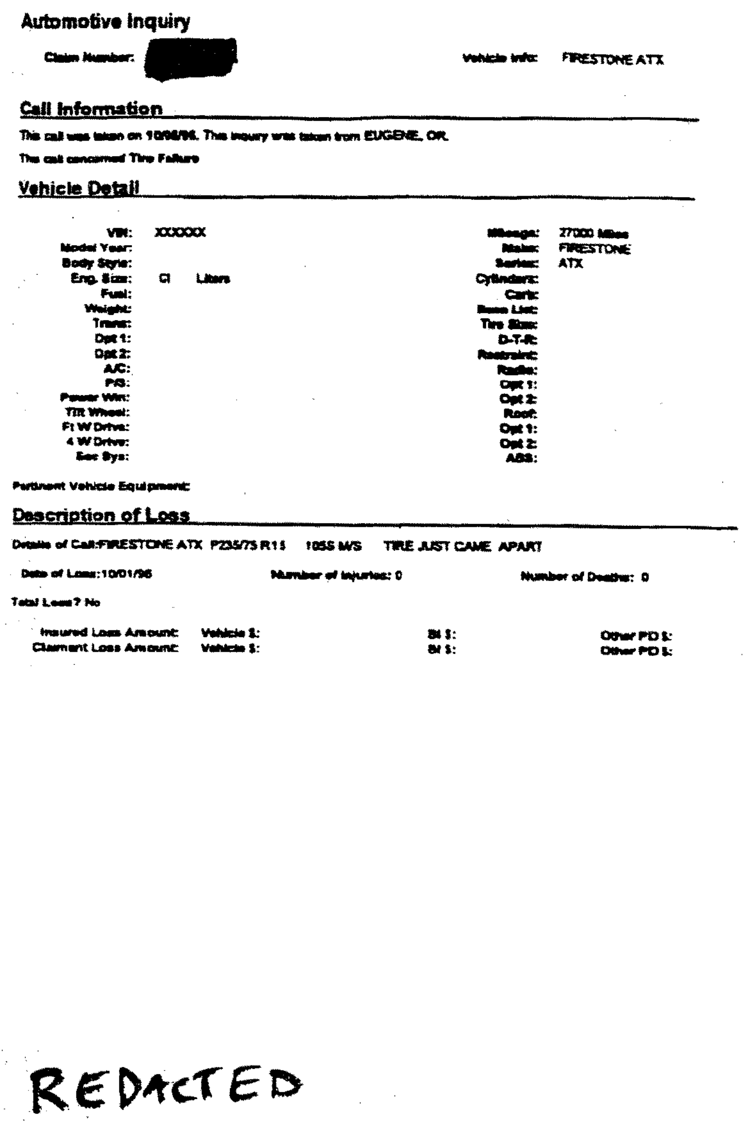
Details of Call: Firestone Radial ATX P235/75R15. Tread peeled off

Date of Loss: 10/05/96 Number of Injuries: 0 Number of Deaths: 0

Total Loss? No

Insured Loss Amount:	Vehicle $: 1,300	BI $:	Other PD $:
Claimant Loss Amount:	Vehicle $:	BI $:	Other PD $:

REDACTED



Automotive Inquiry

Claim Number: [redacted] **Vehicle Info:** FIRESTONE ATX

Call Information

This call was taken on 10/08/96. This inquiry was taken from EUGENE, OR.

This call concerned Tire Failure

Vehicle Detail

VIN:	XXXXXX	**Mileage:**	27000 Miles
Model Year:		**Make:**	FIRESTONE
Body Style:		**Series:**	ATX
Eng. Size:	CI Liters	**Cylinders:**	
Fuel:		**Carb:**	
Weight:		**Base List:**	
Trans:		**Tire Size:**	
Opt 1:		**D-T-R:**	
Opt 2:		**Restraint:**	
A/C:		**Radio:**	
P/S:		**Opt 1:**	
Power Win:		**Opt 2:**	
Tilt Wheel:		**Roof:**	
Ft W Drive:		**Opt 1:**	
4 W Drive:		**Opt 2:**	
Sec Sys:		**ABS:**	

Pertinent Vehicle Equipment:

Description of Loss

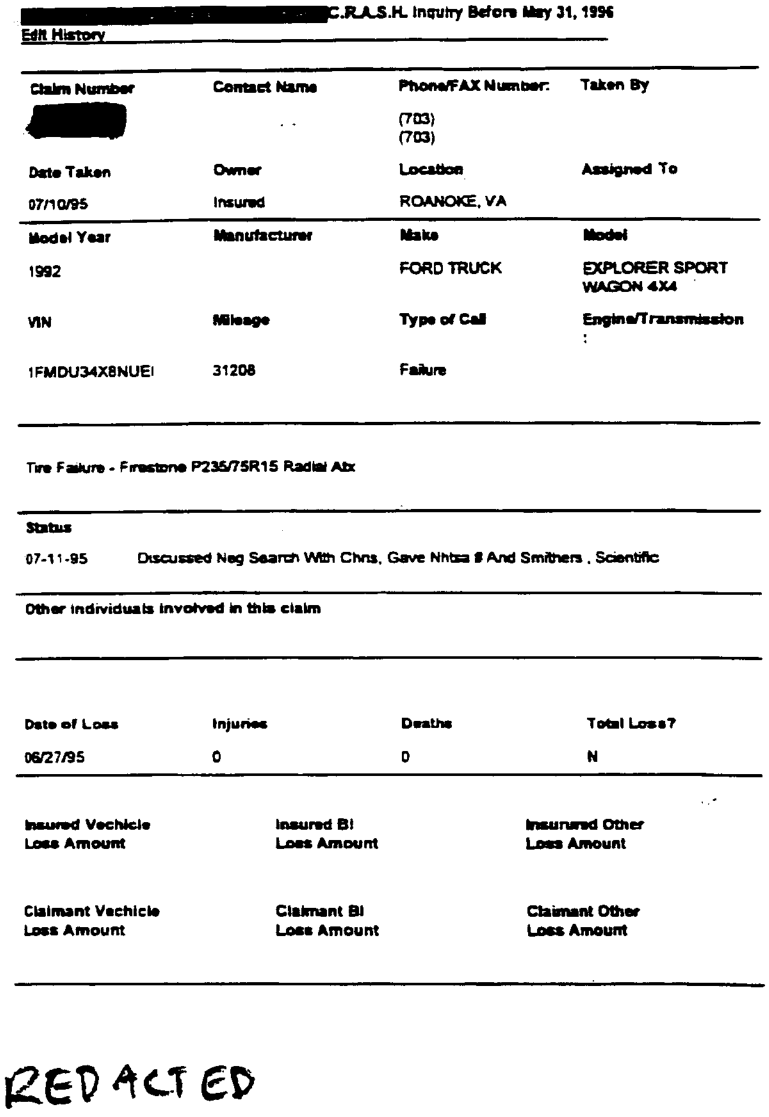
Details of Call:FIRESTONE ATX P235/75 R15 105S M/S TIRE JUST CAME APART

Date of Loss:10/01/96 **Number of Injuries:** 0 **Number of Deaths:** 0

Total Loss? No

Insured Loss Amount:	**Vehicle $:**	**BI $:**	**Other PD $:**
Claimant Loss Amount:	**Vehicle $:**	**BI $:**	**Other PD $:**

REDACTED



[redacted] C.R.A.S.H. Inquiry Before May 31, 1996

Edit History

Claim Number	**Contact Name**	**Phone/FAX Number:**	**Taken By**
[redacted]	. .	(703) (703)	
Date Taken	**Owner**	**Location**	**Assigned To**
07/10/95	Insured	ROANOKE, VA	
Model Year	**Manufacturer**	**Make**	**Model**
1992		FORD TRUCK	EXPLORER SPORT WAGON 4X4
VIN	**Mileage**	**Type of Call**	**Engine/Transmission**
1FMDU34X8NUEI	31208	Failure	:

Tire Failure - Firestone P235/75R15 Radial Atx

Status

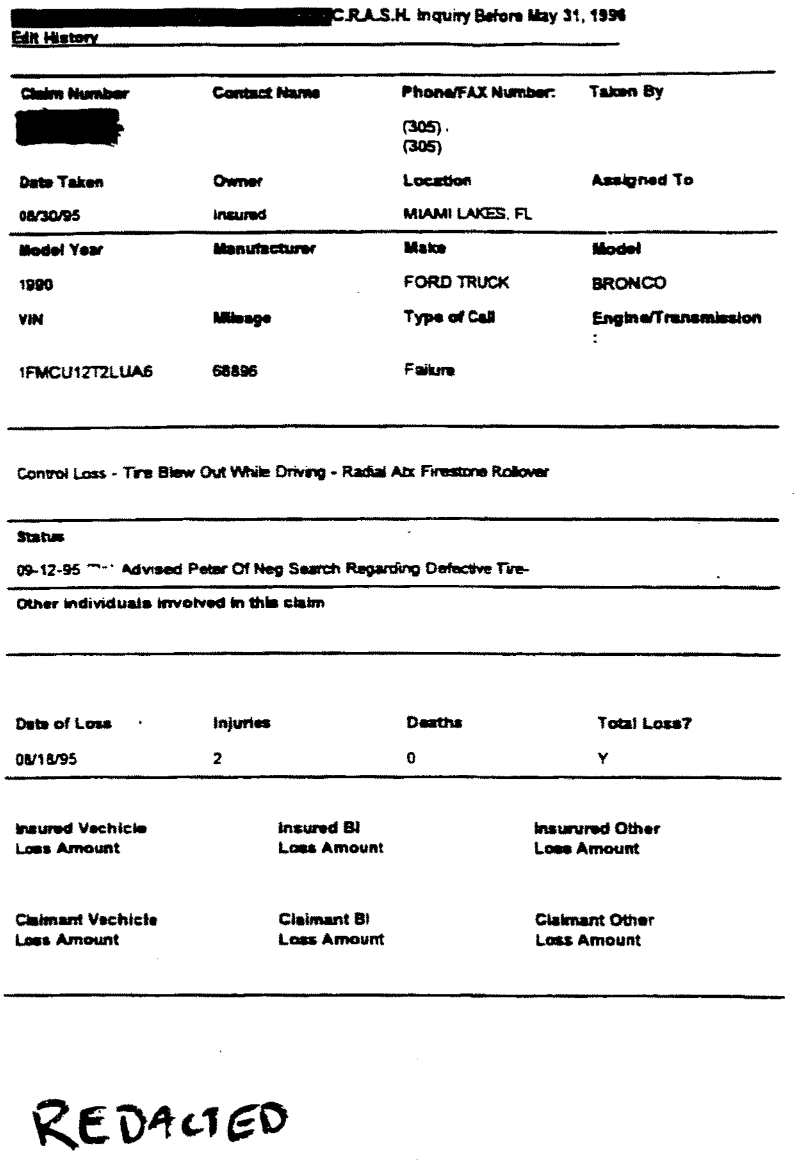
07-11-95 Discussed Neg Search With Chris, Gave Nhtsa # And Smithers, Scientific

Other individuals involved in this claim

Date of Loss	**Injuries**	**Deaths**	**Total Loss?**
06/27/95	0	0	N

Insured Vechicle Loss Amount	**Insured BI Loss Amount**	**Insurured Other Loss Amount**
Claimant Vechicle Loss Amount	**Claimant BI Loss Amount**	**Claimant Other Loss Amount**

REDACTED



[redacted] C.R.A.S.H. Inquiry Before May 31, 1996

Edit History

Claim Number	**Contact Name**	**Phone/FAX Number:**	**Taken By**
[redacted]		(305) . (305)	
Date Taken	**Owner**	**Location**	**Assigned To**
08/30/95	Insured	MIAMI LAKES, FL	
Model Year	**Manufacturer**	**Make**	**Model**
1990		FORD TRUCK	BRONCO
VIN	**Mileage**	**Type of Call**	**Engine/Transmission** :
1FMCU12T2LUA6	68896	Failure	

Control Loss - Tire Blew Out While Driving - Radial Atx Firestone Rollover

Status

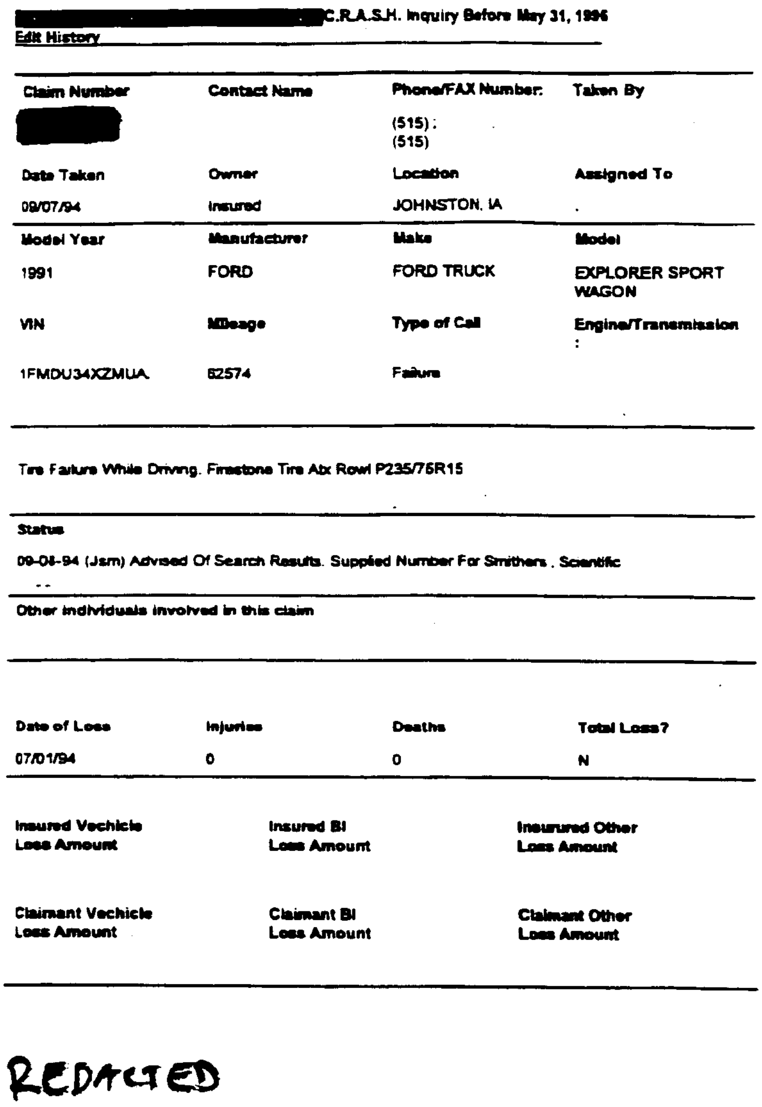
09-12-95 Advised Peter Of Neg Search Regarding Defective Tire-

Other individuals involved in this claim

Date of Loss	**Injuries**	**Deaths**	**Total Loss?**
08/18/95	2	0	Y

Insured Vechicle Loss Amount	**Insured BI Loss Amount**	**Insurured Other Loss Amount**
Claimant Vechicle Loss Amount	**Claimant BI Loss Amount**	**Claimant Other Loss Amount**

REDACTED



[redacted]C.R.A.S.H. Inquiry Before May 31, 1996

Edit History

Claim Number	**Contact Name**	**Phone/FAX Number:**	**Taken By**
[redacted]		(515) : (515)	
Date Taken	**Owner**	**Location**	**Assigned To**
09/07/94	Insured	JOHNSTON, IA	.
Model Year	**Manufacturer**	**Make**	**Model**
1991	FORD	FORD TRUCK	EXPLORER SPORT WAGON
VIN	**Mileage**	**Type of Call**	**Engine/Transmission**
1FMDU34XZMUA	62574	Failure	:

Tire Failure While Driving. Firestone Tire Atx Rowl P235/75R15

Status

09-08-94 (Jsm) Advised Of Search Results. Supplied Number For Smithers, Scientific

Other individuals involved in this claim

Date of Loss	**Injuries**	**Deaths**	**Total Loss?**
07/01/94	0	0	N

Insured Vechicle Loss Amount	**Insured BI Loss Amount**	**Insurured Other Loss Amount**
Claimant Vechicle Loss Amount	**Claimant BI Loss Amount**	**Claimant Other Loss Amount**

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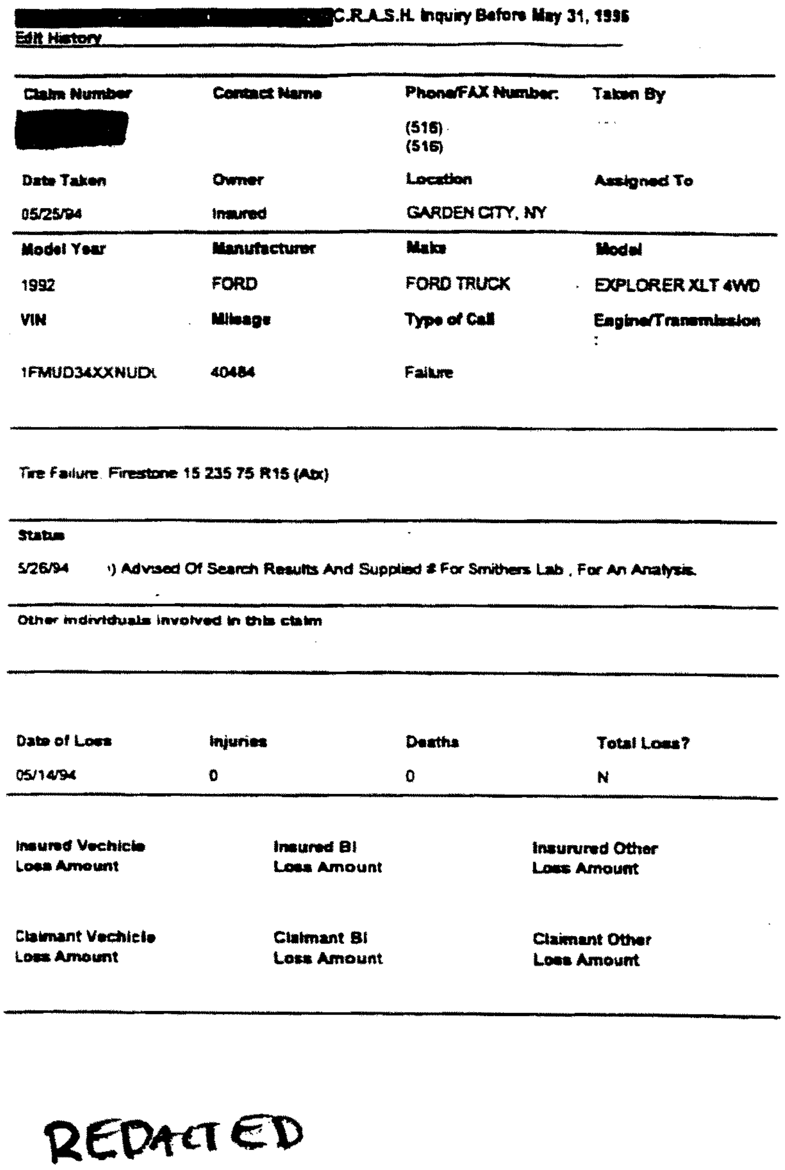

[redacted] C.R.A.S.H. Inquiry Before May 31, 1995

Edit History

Claim Number	**Contact Name**	**Phone/FAX Number:**	**Taken By**
[redacted]		(516) (516)	
Date Taken	**Owner**	**Location**	**Assigned To**
05/25/94	Insured	GARDEN CITY, NY	
Model Year	**Manufacturer**	**Make**	**Model**
1992	FORD	FORD TRUCK	EXPLORER XLT 4WD
VIN	**Mileage**	**Type of Call**	**Engine/Transmission**
1FMUD34XXNUD	40484	Failure	:

Tire Failure: Firestone 15 235 75 R15 (Atx)

Status

5/26/94) Advised Of Search Results And Supplied # For Smithers Lab , For An Analysis.

Other individuals involved in this claim

Date of Loss	**Injuries**	**Deaths**	**Total Loss?**
05/14/94	0	0	N

Insured Vechicle Loss Amount	**Insured BI Loss Amount**	**Insurured Other Loss Amount**
Claimant Vechicle Loss Amount	**Claimant BI Loss Amount**	**Claimant Other Loss Amount**

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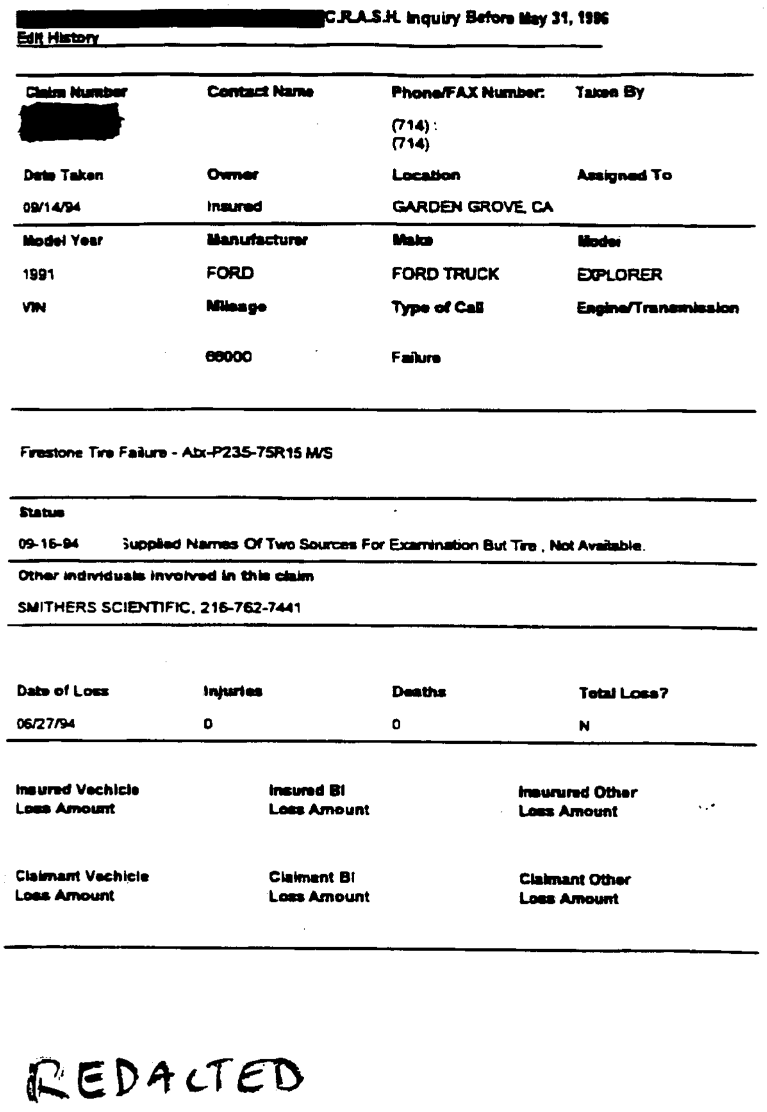

[redacted] C.R.A.S.H. Inquiry Before May 31, 1996

Edit History

Claim Number	**Contact Name**	**Phone/FAX Number:**	**Taken By**
[redacted]		(714) : (714)	
Date Taken	**Owner**	**Location**	**Assigned To**
09/14/94	Insured	GARDEN GROVE, CA	
Model Year	**Manufacturer**	**Make**	**Model**
1991	FORD	FORD TRUCK	EXPLORER
VIN	**Mileage**	**Type of Call**	**Engine/Transmission**
	68000	Failure	

Firestone Tire Failure - Atx-P235-75R15 M/S

Status

09-16-94 Supplied Names Of Two Sources For Examination But Tire , Not Available.

Other individuals involved in this claim

SMITHERS SCIENTIFIC, 216-762-7441

Date of Loss	**Injuries**	**Deaths**	**Total Loss?**
06/27/94	0	0	N

Insured Vechicle Loss Amount	**Insured BI Loss Amount**	**Insurured Other Loss Amount**
Claimant Vechicle Loss Amount	**Claimant BI Loss Amount**	**Claimant Other Loss Amount**

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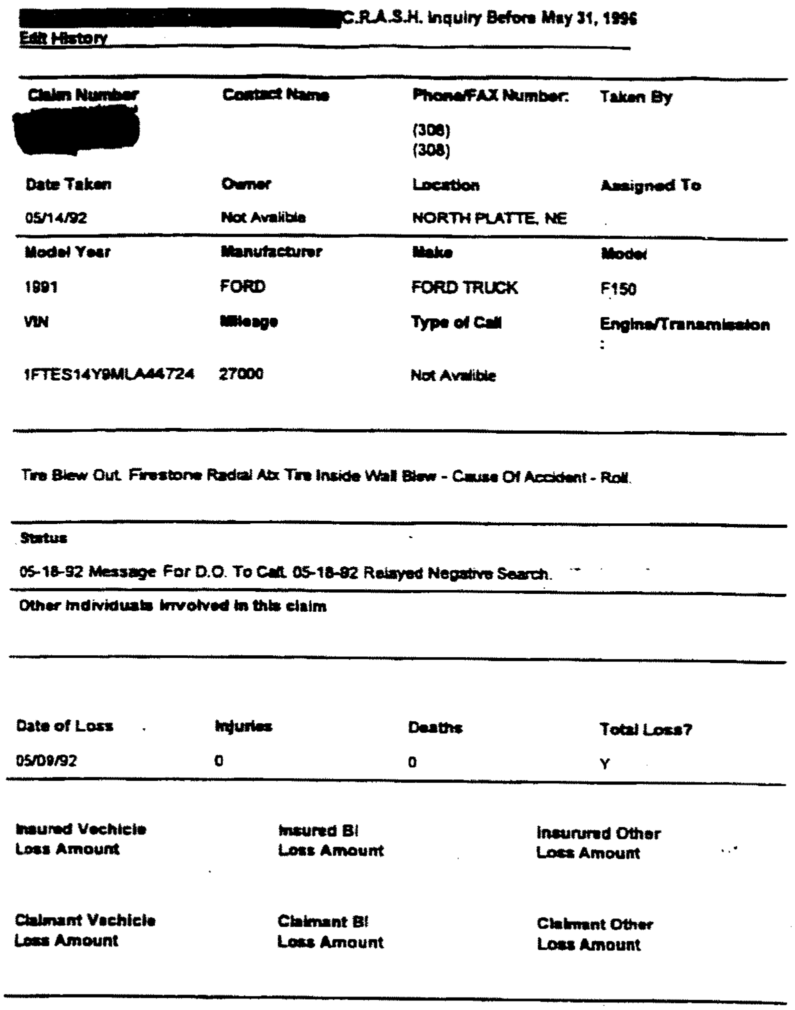

[redacted] C.R.A.S.H. Inquiry Before May 31, 1996

Edit History

Claim Number	**Contact Name**	**Phone/FAX Number:**	**Taken By**
[redacted]		(308) (308)	
Date Taken	**Owner**	**Location**	**Assigned To**
05/14/92	Not Avalible	NORTH PLATTE, NE	
Model Year	**Manufacturer**	**Make**	**Model**
1991	FORD	FORD TRUCK	F150
VIN	**Mileage**	**Type of Call**	**Engine/Transmission** :
1FTES14Y9MLA44724	27000	Not Avalible	

Tire Blew Out. Firestone Radial Atx Tire Inside Wall Blew - Cause Of Accident - Roll.

Status

05-18-92 Message For D.O. To Call. 05-18-92 Relayed Negative Search.

Other individuals involved in this claim

Date of Loss	**Injuries**	**Deaths**	**Total Loss?**
05/09/92	0	0	Y

Insured Vechicle Loss Amount	**Insured BI Loss Amount**	**Insurured Other Loss Amount**
Claimant Vechicle Loss Amount	**Claimant BI Loss Amount**	**Claimant Other Loss Amount**

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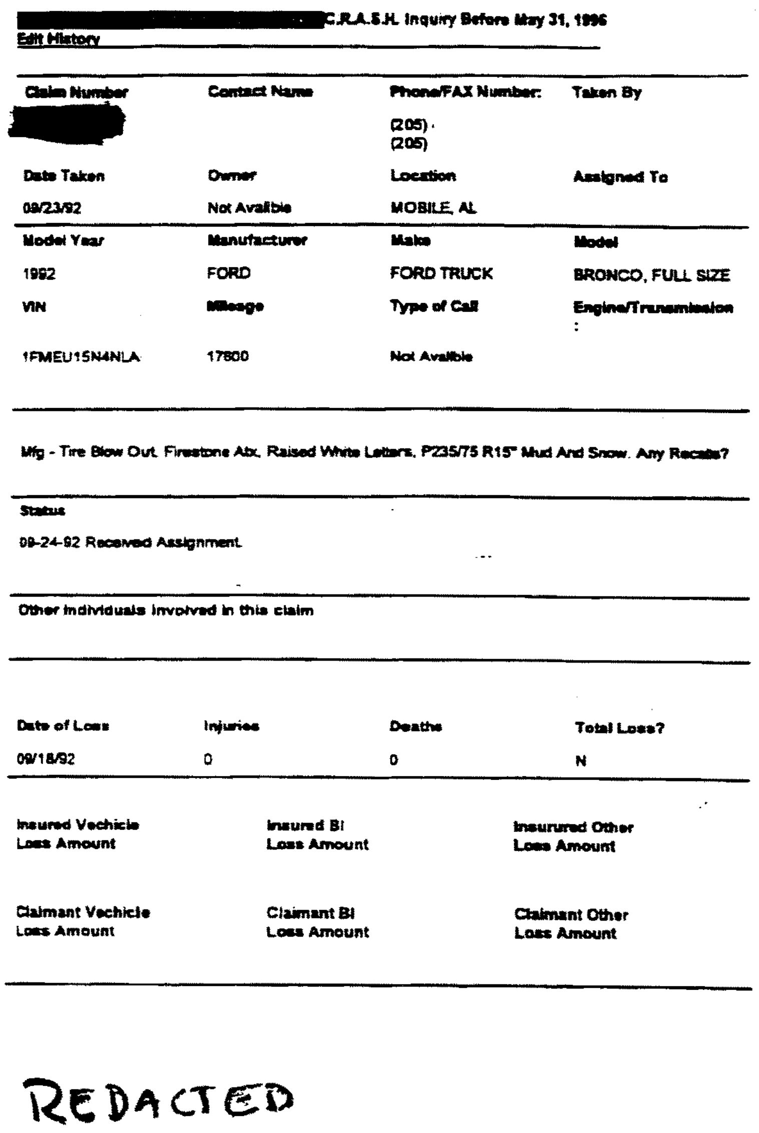

[redacted] C.R.A.S.H. Inquiry Before May 31, 1996

Edit History

Claim Number	**Contact Name**	**Phone/FAX Number:**	**Taken By**
[redacted]		(205) (205)	
Date Taken	**Owner**	**Location**	**Assigned To**
09/23/92	Not Avalible	MOBILE, AL	
Model Year	**Manufacturer**	**Make**	**Model**
1992	FORD	FORD TRUCK	BRONCO, FULL SIZE
VIN	**Mileage**	**Type of Call**	**Engine/Transmission** :
1FMEU15N4NLA	17600	Not Avalible	

Mfg - Tire Blow Out. Firestone Atx. Raised White Letters. P235/75 R15" Mud And Snow. Any Recalls?

Status

09-24-92 Received Assignment

Other individuals involved in this claim

Date of Loss	**Injuries**	**Deaths**	**Total Loss?**
09/18/92	0	0	N

Insured Vechicle Loss Amount	**Insured BI Loss Amount**	**Insurured Other Loss Amount**
Claimant Vechicle Loss Amount	**Claimant BI Loss Amount**	**Claimant Other Loss Amount**

REDACTED

[redacted]C.R.A.S.H. Inquiry Before May 31, 1996

Edit History

Claim Number	**Contact Name**	**Phone/FAX Number:**	**Taken By**
[redacted]		(405) (405)	:
Date Taken	**Owner**	**Location**	**Assigned To**
07/25/94	Insured	STILLWATER, OK	
Model Year	**Manufacturer**	**Make**	**Model**
1991	FORD	FORD TRUCK	EXPLORER 4.0 V6
VIN	**Mileage**	**Type of Call**	**Engine/Transmission** :
1FMDU32X5MUA	55721	Failure	

Tire Failure. Left Front Tire Separated Causing Control Loss And Off Road Rollover.

Status

07-26-94 Left Message For Kevin To Call. 1:22 Pm , 07-27-94 (Sms) Spoke With Kevin, Advised Of Need For Engineering , Analysis On Tire To Confirm Failure. Offered Smithers And Peter R. Thom , As Possible Analysis Candidates. 11:20 Am , Firestone P235/75R15 5/32 To 7/32 Tread Radial Atx

Other individuals involved in this claim

Date of Loss	**Injuries**	**Deaths**	**Total Loss?**
07/10/94	1	2	Y

Insured Vechicle Loss Amount	**Insured BI Loss Amount**	**Insurured Other Loss Amount**
Claimant Vechicle Loss Amount	**Claimant BI Loss Amount**	**Claimant Other Loss Amount**

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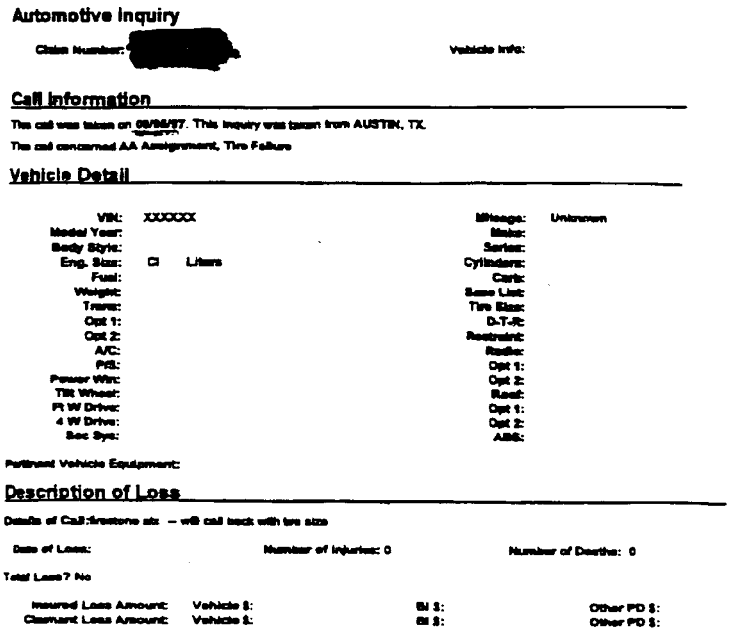


Automotive Inquiry

Claim Number:	[redacted]	Vehicle Info:	

Call Information

This call was taken on 06/06/97. This inquiry was taken from AUSTIN, TX.

The call concerned AA Assignment, Tire Failure

Vehicle Detail

VIN:	XXXXXX	Mileage:	Unknown
Model Year:		Make:	
Body Style:		Series:	
Eng. Size:	CI Liters	Cylinders:	
Fuel:		Carb:	
Weight:		Base List:	
Trans:		Tire Size:	
Opt 1:		D-T-R:	
Opt 2:		Restraint:	
A/C:		Radio:	
P/S:		Opt 1:	
Power Win:		Opt 2:	
Tilt Wheel:		Roof:	
Ft W Drive:		Opt 1:	
4 W Drive:		Opt 2:	
Sec Sys:		ABS:	

Pertinent Vehicle Equipment:

Description of Loss

Details of Call:firestone atx -- will call back with tire size

Date of Loss:

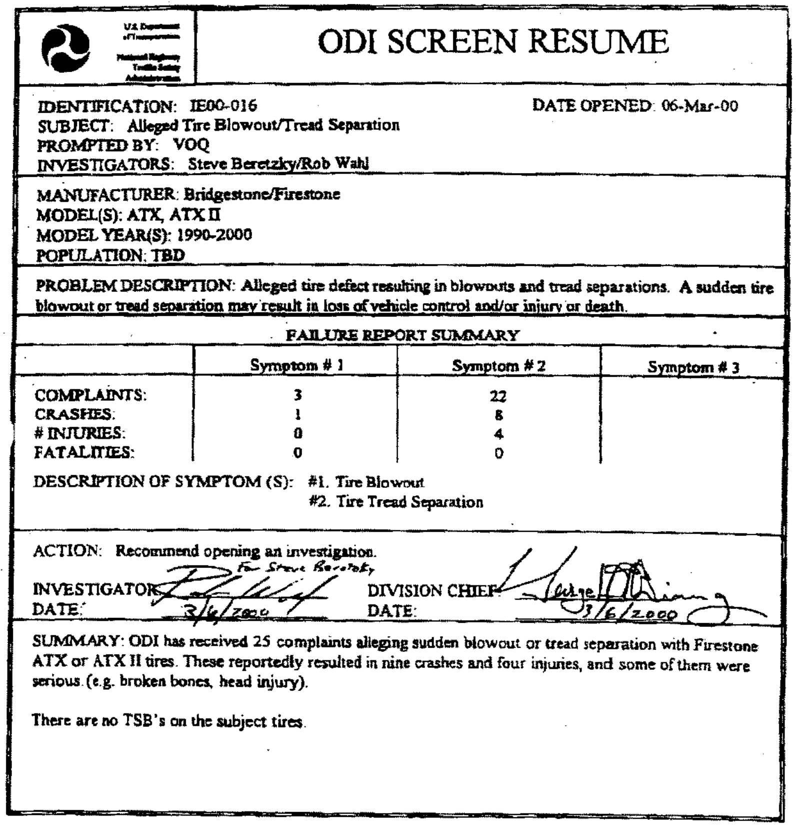
Number of Injuries: 0

Number of Deaths: 0

Total Loss? No

Insured Loss Amount:	Vehicle $:	BI $:	Other PD $:
Claimant Loss Amount:	Vehicle $:	BI $:	Other PD $:

REDACTED



ODI SCREEN RESUME

IDENTIFICATION: IE00-016 **DATE OPENED:** 06-Mar-00
SUBJECT: Alleged Tire Blowout/Tread Separation
PROMPTED BY: VOQ
INVESTIGATORS: Steve Beretzky/Rob Wahl

MANUFACTURER: Bridgestone/Firestone
MODEL(S): ATX, ATX II
MODEL YEAR(S): 1990-2000
POPULATION: TBD

PROBLEM DESCRIPTION: Alleged tire defect resulting in blowouts and tread separations. A sudden tire blowout or tread separation may result in loss of vehicle control and/or injury or death.

FAILURE REPORT SUMMARY

	Symptom # 1	Symptom # 2	Symptom # 3
COMPLAINTS:	3	22	
CRASHES:	1	8	
# INJURIES:	0	4	
FATALITIES:	0	0	

DESCRIPTION OF SYMPTOM (S): #1. Tire Blowout
#2. Tire Tread Separation

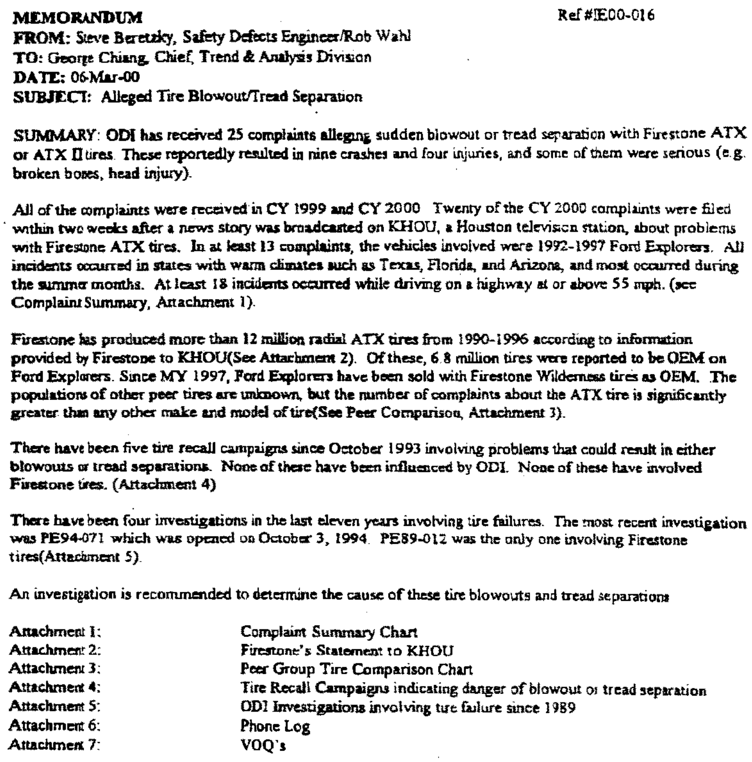
ACTION: Recommend opening an investigation.

For Steve Beretzky
INVESTIGATOR
DATE: 3/6/2000

DIVISION CHIEF
DATE: 3/6/2000

SUMMARY: ODI has received 25 complaints alleging sudden blowout or tread separation with Firestone ATX or ATX II tires. These reportedly resulted in nine crashes and four injuries, and some of them were serious (e.g. broken bones, head injury).

There are no TSB's on the subject tires.



MEMORANDUM Ref #IE00-016

FROM: Steve Beretzky, Safety Defects Engineer/Rob Wahl
TO: George Chiang, Chief, Trend & Analysis Division
DATE: 06-Mar-00
SUBJECT: Alleged Tire Blowout/Tread Separation

SUMMARY: ODI has received 25 complaints alleging sudden blowout or tread separation with Firestone ATX or ATX II tires. These reportedly resulted in nine crashes and four injuries, and some of them were serious (e.g. broken bones, head injury).

All of the complaints were received in CY 1999 and CY 2000 Twenty of the CY 2000 complaints were filed within two weeks after a news story was broadcasted on KHOU, a Houston television station, about problems with Firestone ATX tires. In at least 13 complaints, the vehicles involved were 1992-1997 Ford Explorers. All incidents occurred in states with warm climates such as Texas, Florida, and Arizona, and most occurred during the summer months. At least 18 incidents occurred while driving on a highway at or above 55 mph. (see Complaint Summary, Attachment 1).

Firestone has produced more than 12 million radial ATX tires from 1990-1996 according to information provided by Firestone to KHOU(See Attachment 2). Of these, 6.8 million tires were reported to be OEM on Ford Explorers. Since MY 1997, Ford Explorers have been sold with Firestone Wilderness tires as OEM. The populations of other peer tires are unknown, but the number of complaints about the ATX tire is significantly greater than any other make and model of tire(See Peer Comparison, Attachment 3).

There have been five tire recall campaigns since October 1993 involving problems that could result in either blowouts or tread separations. None of these have been influenced by ODI. None of these have involved Firestone tires. (Attachment 4)

There have been four investigations in the last eleven years involving tire failures. The most recent investigation was PE94-071 which was opened on October 3, 1994. PE89-012 was the only one involving Firestone tires(Attachment 5).

An investigation is recommended to determine the cause of these tire blowouts and tread separations

Attachment 1:	Complaint Summary Chart
Attachment 2:	Firestone's Statement to KHOU
Attachment 3:	Peer Group Tire Comparison Chart
Attachment 4:	Tire Recall Campaigns indicating danger of blowout or tread separation
Attachment 5:	ODI Investigations involving tire failure since 1989
Attachment 6:	Phone Log
Attachment 7:	VOQ's

Complaint Summary

Complaints Filed on Firestone Tires from 1998-2000 Indicating "Failure" "Blowout" or "Tread Separation"

VOQ	Last Name	Model	Complaint Date	Failure Date	Tire Mileage at Failure	State	Type of Failure	Loss of Control	Injuries	Speed at Failure	Vehicle Make, Model, and Year
538256	[redacted]	185	06/07/99	unk	unk	unk	Blowout	unk	unk	unk	unk
unk	[redacted]	215	05/11/99	11/12/98	unk	unk	Blowout	Yes	Yes	80	unk
857014	[redacted]	680	02/16/00	08/18/99	28,000	TX	Tread Sep.	No	None	70	1998 Mercury Cougar
708029	[redacted]	721	09/09/99	1/99	18,000	OK	Blowout	No	None	60-65	Cadillac
701780	[redacted]	480	01/10/99	06/12/98	45,000	MD	Sidewall	No	None	60	unk
607640	[redacted]	Affinity	05/11/99	10/19/98	unk	unk	Blowout	unk	unk	unk	Chevy Prizm
547755	[redacted]	Apt Duster	08/23/99	09/05/97	unk	unk	Tread Sep.	unk	unk	unk	unk
841846	[redacted]	ATX	07/06/99	5/99	<40,000	TX	Tread Sep.	Yes	Head Injury, Broken Pelvis	70-75	Ford Explorer
517809	[redacted]	ATX	08/23/99	05/16/99	3000	FL	Blowout	Yes	None	70	unk
856553	[redacted]	ATX	02/08/00	02/02/00	<20,000	TX	Tread Sep.	Yes	None		1998 Ford Explorer
718537	[redacted]	ATX	02/08/00	12/18/99	71,500	TX	Tread Sep.	No	None	65	1994 Ford Explorer
856619	[redacted]	ATX	02/09/00				Tread Sep.	Yes			1994 Ford Explorer
856564	[redacted]	ATX	02/09/00	5/98	<10,000	TX	Tread Sep.	Yes	mild concussion	65	1993 Ford Explorer
856586	[redacted]	ATX	02/09/00	unk	unk	TX	Tread Sep.	No	None	50	Isuzu Trooper
718540	[redacted]	ATX	02/09/00	12/03/99	89,000	TX	Tread Sep.	No	None	55	1995 Ford F 150
718583	[redacted]	ATX	02/10/00	06/06/99	61,000	TX	Tread Sep.	No	None	55	1994 Ford Explorer
718583	[redacted]	ATX	02/10/00	12/26/98	48,000	TX	Tread Sep.	No	None	70	1994 Ford Explorer
858064	[redacted]	ATX	02/10/00	12/01/98	<20,000	TX	Blowout	No	None	70	1992 Ford Explorer
856776	[redacted]	ATX	02/11/00	11/08/99	unk	TX	Tread Sep.	No	None	unk	unk
856734	[redacted]	ATX	02/11/00			TX	Tread Sep	No	None	70	
856833	[redacted]	ATX	02/14/00			TX	Tread Sep.	No	None		
856857	[redacted]	ATX	02/14/00			TX	Tread Sep.	Yes	None		1995 Ford Explorer
856839	[redacted]	ATX	02/14/00	07/27/99	48,000	TX	Blowout	Yes	None	70	1998 Ford Explorer
856947	[redacted]	ATX	02/15/00			TX	Tread Sep.	Yes	None	60-70	
856917	[redacted]	ATX	02/16/00	08/28/99	33,000	TX	Tread Sep.	Yes	Minor		1998 Ford Explorer
718818	[redacted]	ATX	02/17/00	11/07/97	92,000	TX	Tread Sep.	No	None	70	1993 Ford Explorer
857146	[redacted]	ATX	02/17/00	01/11/00	40,000	TX	Tread Sep.	Yes	Minor	70	1997 Ford Explorer
857342	[redacted]	ATX	02/22/00	11/07/98	39,000	TX	Tread Sep	Yes	Broken Collar Bone	70	1998 Ford Explorer
719117	[redacted]	ATX	02/23/00	10/01/99	80,000	TX	Tread Sep.	Yes	Minor	70	1995 Ford Explorer
839534	[redacted]	ATX II	06/14/99	06/14/99	1500	FL	Tread Sep.	Yes	Minor	70	1998 Ford Explorer
844304	[redacted]	ATX II	08/04/99	6/99	35,000	UT	Tread Sep.	Yes	unk	70-75	Ford Explorer

REDACTED

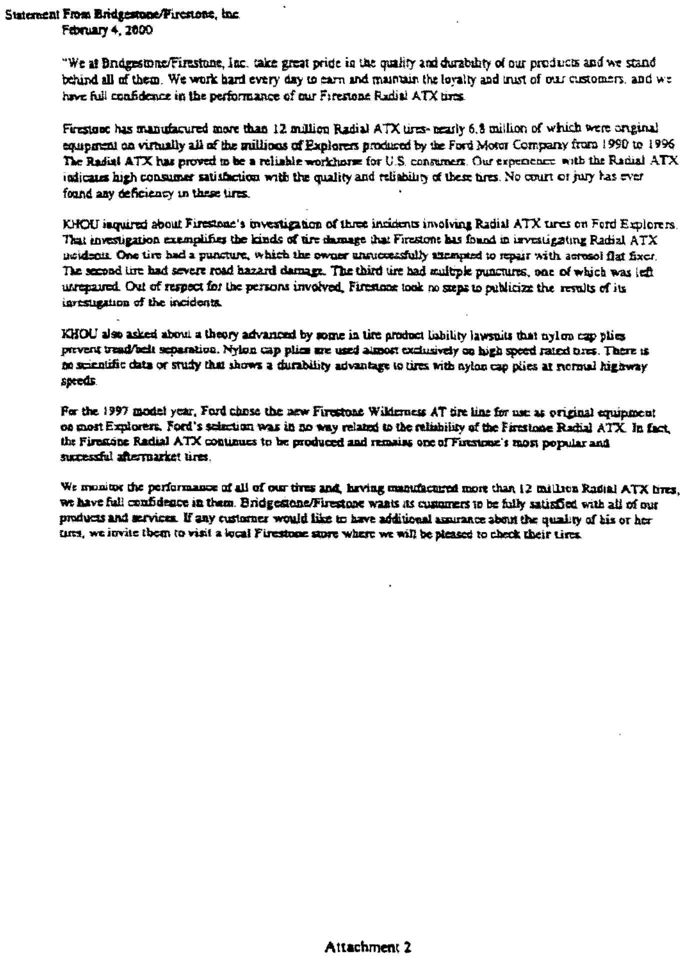
Attachment 1

709(	[redacted]	ATX #	09/21/00	7/99	20,000	AZ	Tread Sep.	No	None	60-65	1995 Ford Explorer
541646	[redacted]	Firehawk	05/15/99	08/13/98	19,000	CA	Blowout	Yes	2 Fatalities, Broken Bones	70	GMC Suburban
657043	[redacted]	Steel Tex	02/16/00	05/30/99	30,000	PA	Tread Sep.				
538660	[redacted]	unk	10/14/99	unk	unk	unk	Blowout	unk	unk	unk	unk
514968	[redacted]	unk	10/20/98	unk	unk	unk	Tread sep.	unk	unk	unk	unk
780104	[redacted]	unk	11/18/98	unk	unk	unk	Tread sep.	unk	unk	unk	1986 Ford Explorer
605668	[redacted]	unk	01/05/99	1/97	7000	CA	Blowout	No	None	68	unk
604588	[redacted]	unk	03/12/99	11/01/99	<10,000	NY	Blowouts	No	None	60	Toyota Camry
608570	[redacted]	unk	06/11/99	11/09/98	unk	unk	unk	unk	unk	unk	Ford Crown Victoria
707821	[redacted]	unk	06/14/99	10/01/98			Tread Sep.				Ford Explorer
548484	[redacted]	unk	09/30/99	06/09/98			unk				Ford Econoline
656586	[redacted]	unk	02/09/00	9/99	35,000	TX	Blowout	No	None	65	1991 Ford Explorer
656568	[redacted]	unk	02/09/00	01/06/00	<10,000	TX	Blowout	Yes	Minor		1998 Ford Explorer
656675	[redacted]	unk	02/10/00			TX	Tread Sep.	No	None	65-70	
656098	[redacted]	unk	02/10/00	unk	unk	TX	Tread Sep.	Yes	Shoulder injury	65	1998 Ford Explorer
718546	[redacted]	unk	02/10/00		40,000	TX	Tread Sep.	No	None	55	1996 Ford Thunderbird
608622	[redacted]	Wilderness	07/30/99	06/01/98	unk	unk	Blowout	unk	unk	unk	unk
718499	[redacted]	Wilderness	02/09/00	09/06/98	2050	TX	Blowout	No	None	55	1999 Ford Explorer
718553	[redacted]	Wilderness	02/10/00	01/01/00	20,000	TX	Blowout	No	None	55	1998 Ford Ranger
718626	[redacted]	Wilderness	02/11/00	12/17/99	18,475	TX	Tread Sep.	Yes	None	70	1996 Ford Explorer
718731	[redacted]	Wilderness	02/14/00	01/30/00		FL	Tread Sep.	No	None		1997 Ford F150
718913	[redacted]	Wilderness	02/17/00	11/11/98	1000	CA	Blowout	Yes	None	68	1999 Ford Explorer
857336	[redacted]	Wilderness	02/22/00	08/21/98	40,000	TX	Tread Sep.	Yes	5 Minor Injuries	65	1997 Ford Explorer
	[redacted]										

Average ATX Tire Mileage at Failure 41,000

REDACTED

Attachment 1



Statement From Bridgestone/Firestone, Inc.
February 4, 2000

"We at Bridgestone/Firestone, Inc. take great pride in the quality and durability of our products and we stand behind all of them. We work hard every day to earn and maintain the loyalty and trust of our customers, and we have full confidence in the performance of our Firestone Radial ATX tires.

Firestone has manufactured more than 12 million Radial ATX tires- nearly 6.8 million of which were original equipment on virtually all of the millions of Explorers produced by the Ford Motor Company from 1990 to 1996. The Radial ATX has proved to be a reliable workhorse for U.S. consumers. Our experience with the Radial ATX indicates high consumer satisfaction with the quality and reliability of these tires. No court or jury has ever found any deficiency in these tires.

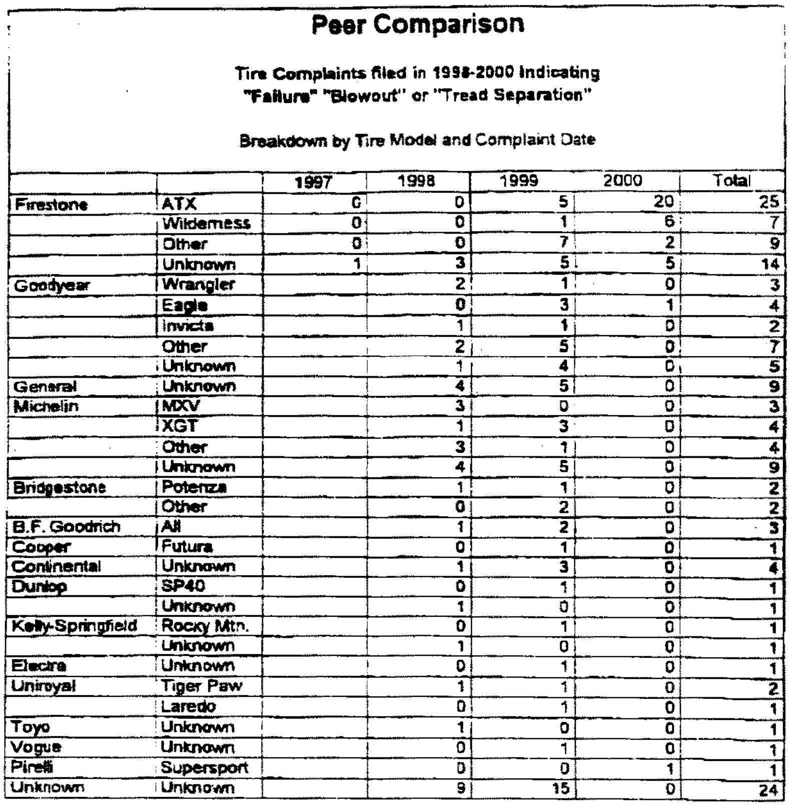
KHOU inquired about Firestone's investigation of three incidents involving Radial ATX tires on Ford Explorers. That investigation exemplifies the kinds of tire damage that Firestone has found in investigating Radial ATX incidents. One tire had a puncture, which the owner unsuccessfully attempted to repair with aerosol flat fixer. The second tire had severe road hazard damage. The third tire had multiple punctures, one of which was left unrepaired. Out of respect for the persons involved, Firestone took no steps to publicize the results of its investigation of the incidents.

KHOU also asked about a theory advanced by some in tire product liability lawsuits that nylon cap plies prevent tread/belt separation. Nylon cap plies are used almost exclusively on high speed rated tires. There is no scientific data or study that shows a durability advantage to tires with nylon cap plies at normal highway speeds.

For the 1997 model year, Ford chose the new Firestone Wilderness AT tire line for use as original equipment on most Explorers. Ford's selection was in no way related to the reliability of the Firestone Radial ATX. In fact, the Firestone Radial ATX continues to be produced and remains one of Firestone's most popular and successful aftermarket tires.

We monitor the performance of all of our tires and, having manufactured more than 12 million Radial ATX tires, we have full confidence in them. Bridgestone/Firestone wants its customers to be fully satisfied with all of our products and services. If any customer would like to have additional assurance about the quality of his or her tires, we invite them to visit a local Firestone store where we will be pleased to check their tires.

Attachment 2



Peer Comparison

Tire Complaints filed in 1998-2000 Indicating
"Failure" "Blowout" or "Tread Separation"

Breakdown by Tire Model and Complaint Date

		1997	1998	1999	2000	Total
Firestone	**ATX**	0	0	5	20	25
	Wilderness	0	0	1	6	7
	Other	0	0	7	2	9
	Unknown	1	3	5	5	14
Goodyear	**Wrangler**		2	1	0	3
	Eagle		0	3	1	4
	Invicta		1	1	0	2
	Other		2	5	0	7
	Unknown		1	4	0	5
General	**Unknown**		4	5	0	9
Michelin	**MXV**		3	0	0	3
	XGT		1	3	0	4
	Other		3	1	0	4
	Unknown		4	5	0	9
Bridgestone	**Potenza**		1	1	0	2
	Other		0	2	0	2
B.F. Goodrich	**All**		1	2	0	3
Cooper	**Futura**		0	1	0	1
Continental	**Unknown**		1	3	0	4
Dunlop	**SP40**		0	1	0	1
	Unknown		1	0	0	1
Kelly-Springfield	**Rocky Mtn.**		0	1	0	1
	Unknown		1	0	0	1
Electra	**Unknown**		0	1	0	1
Uniroyal	Tiger Paw		1	1	0	2
	Laredo		0	1	0	1
Toyo	Unknown		1	0	0	1
Vogue	Unknown		0	1	0	1
Pirelli	Supersport		0	0	1	1
Unknown	Unknown		9	15	0	24

Attachment 3

DEFECT RECALL CAMPAIGNS

Campaign No	Date 573	Mfr Name	No.of Units	Owner Notified
99T008000	23-SEP-1999	CONTINENTAL GENERAL TIRE INC	4750	28-SEP-1999

Make	Model	Ty/Yr/No	Mfr Camp No	Built From	To
GENERAL	29575R225	1900	99T009000	06-DEC-98	15-FEB-99

System: TIRES:CORD

Defect Descr: Tire Description: S380A 295/75R22.5 LR G tires manufactured during the 48th week of 1998 (December 1998) through the 8th week of 1999 (February 1999); Serial Nos. A3371E5488 through A3371E5089. These tires have been overcured.

Defect Consequence: This condition can cause tire failure.

Corrective Action: Dealers will exchange the tire for an identical or reasonabley equivalent tire.

Notes: Owner notification began September 28, 1999. Owners who take their vehicles to an authorized dealer on an agreed upon service date and do not receive the free remedy within a reasonable time should contact Continental General at 1-800-726-7113. Also contact the National Highway Traffic Safety Administration's Auto Safety Hotline at 1-888-DASH-2-DOT (1-888-327-4236).

DEFECT RECALL CAMPAIGNS

Campaign No	Date 573	Mfr Name	No.of Units	Owner Notified
99 T008 000	13-MAY-1999	FALKEN TIRE CORPORATION	1897	01-JUN-1999

Make	Model	Ty/Ir/No	Mfr Camp No	Built From	To
FALKEN	LT24575R16	1900	99-01	01-JAN-96	30-JUN-97

System: TIRES:SIDEWALL

Defect Descr: Tire Description: Radial A/P, LT245/75R16, 10 PR, Load Range E, tires manufactured from January 1996 through June 1997 (Serial Nos. ending016 and 267), installed on Alfa Ideal Trailer Model 235 (ID35RLT). If the tires are not properly inflated or if the Alfa Ideal Model 235 Trailer is overloaded, the raised white rubber side letter can separate from the black rubber sidewall of the tire.

Defect Consequence: This condition could cause a tire blow out, increasing the risk of a crash.

Corrective Action: Falken will replace the tires, including the spare.

Notes: Owner notification began June 1, 1999. Owners who take their trailers to an authorized dealer on an agreed upon service date and do not receive the free remedy within a reasonable time should contact Falken at 1-800-723-2553, extensions 440 or 280. Also contact the National Highway Traffic Safety Administration's Auto Safety Hotline at 1-888-DASH-2-DOT (1-888-327-4236).

DEFECT RECALL CAMPAIGNS

Campaign No	Date 573	Mfr Name	No.of Units	Owner Notified
97T008000	24-NOV-1997	COOPER TIRE & RUBBER CO.	607	03-DEC-1997

Make	Model	Ty/Yr/No	Mfr Camp No	Built From	To
COOPER	P21570R14	1900	102	07-SEP-97	13-SEP-97

System: TIRES:CORD

Defect Descr: Tire Description: Cooper Trendsetter SE P215/70R14 (Serial No. 3DHYZ2J367, manufactured September 7 - 13, 1997; Multi-Mile Matrix, P215/70R14 (Serial No. 3DHYTMN367, SEPTEMBER 7 - 13, 1997; and Western Auto Sentry Premier II A/S P215/70R14 (Serial No. 3DHYUDH367, September 7 -13, 1997.) These tires may not have adequate rubber coverage of the belt edge in the shoulder slots, resulting in a separation.

Defect Consequence: This condition can cause the tire to separate. If the separation is not detected, continued use could cause the ply cords to break and the tubeless liner to tear losing the inflated air. Loss of air could result in loss of control of the vehicle increasing the risk of a vehicle crash.

Corrective Action: Dealers will replace these tires as well as mount and balance the new tires.

Notes: Owner Notification is expected to begin December 3, 1997. Note: Owners who take their tires to an authorized dealer and do not receive a free replacement within a reasonable time should contact Cooper at 1-800-854-6288. Also contact the National Highway Traffic Safety Administration's Auto Safety Hotline at 1-800-424-9393.

DEFECT RECALL CAMPAIGNS

Campaign No	Date 573	Mfr Name	No.of Units	Owner Notified
97T004000	08-APR-1997	FIDELITY TIRE MANUFACTURING	5070	08-APR-1997

Make	Model	Ty/Yr/No	Mfr Camp No	Built From	To
FIDELITY	7.00-15	1900	97T004000	20-OCT-96	09-MAR-97

System: TIRES

Defect Descr: Tire Description: Fidelity Century Rib 7.00-15 LT Load Range "C" bearing item number F06745 or Gateway Highway Light Truck 7.00-15 LT Load Range "C" bearing item number K06745, Serial Nos. FONVKD3436 FONVKD3446, FONVKD3456, FONVKD3466, FONVKD3476, FONVKD3486, FONVKD3496, FONVKD3506, FONVKD3516, FONVKD3526, FONVKD3017, FONVKD3027, FONVKD3037, FONVKD3047, FONVKD3057, FONVKD3067, FONVKD3077, FONVKD3087, FONVKD3097, and FONVKD3107. These tires do not meet the carcass breaking energy requirements of Federal Motor Vehicle Safety Standard No. 119, "New Pneumatic Tires for Vehicles other than Passenger Cars."

Defect Consequence: In encountering a severe road hazard, the tire carcass could puncture causing a loss of air increasing the potential for loss of vehicle control.

Corrective Action: Dealers will replace these tires, mounting and balancing the new tires.

Notes: Owner notification began April 8, 1997. Owners who take their tires to an authorized dealer and do not receive the free replacement tires within a reasonable time should contact Fidelity at 1-601-445-2550. Also contact the National Highway Traffic Safety Administration's Auto Safety Hotline at 1-800-424-9393.

DEFECT RECALL CAMPAIGNS

Campaign No	Date 573	Mfr Name	No. of Units	Owner Notified
93T008 000	25-OCT-1993	COOPER TIRE & RUBBER CO.	401	21-OCT-1993

Make	Model	Ty/Yr/No	Mfr Camp No	Built From	To
COOPER	P27560R15	1903	UNKNOWN	01-AUG-93	01-SEP-93

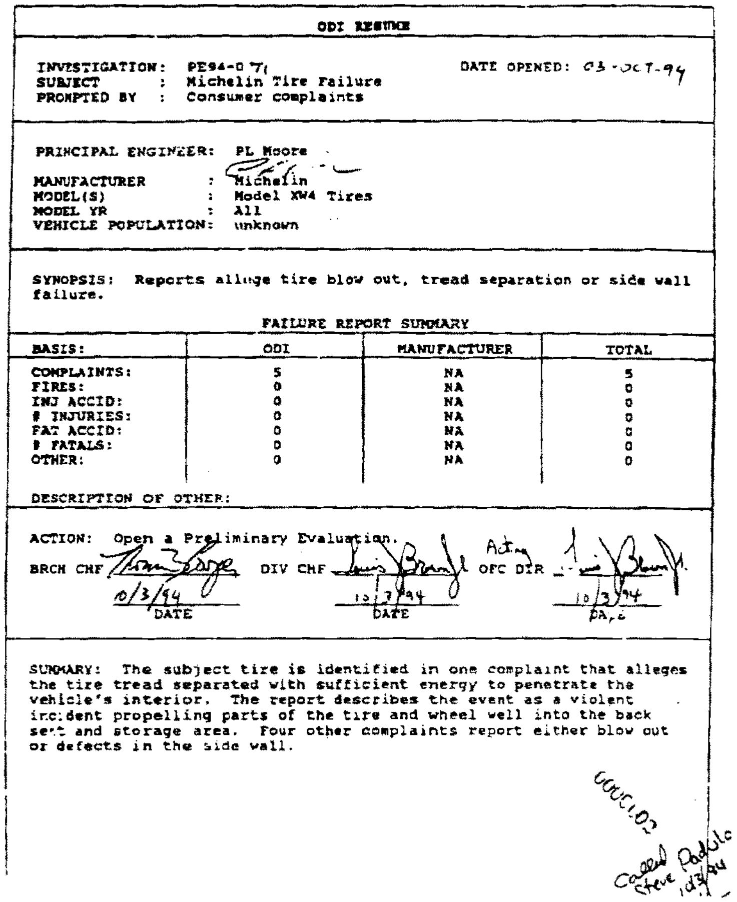
System: TIRES

Defect Descr: THE CURE CYCLE RECEIVED BY THESE TIRES WAS AT LEAST DOUBLE THE STANDARD TIME.

Defect Consequence: THE OVERCURED CONDITION OF THESE TIRES CAN RESULT INTREAD SEPARATION. IF TREAD SEPARATION IS NOT NOTICED, CONTINUED USE MAY CAUSESUDDEN LOSS OF AIR WHICH MAY RESULT IN LOSS OF STEERING CONTROL WITH THEPOTENTIAL FOR A VEHICLE ACCIDENT.

Corrective Action: COOPER WILL REPLACE THESE TIRES, AND MOUNT AND BALANCE THE NEW TIRES AT NO CHARGE.

Notes: SYSTEM: TIRES.TIRE DESCRIPTION: COBRA RADIAL GTS, POLYESTER/STEEL TUBELESS RADIAL TIRES,SIZE P275/60R15.NOTES: TIRE SERIAL NO. INVOLVED IS UTR7CXJ353.IF YOUR TIRE IS PRESENTED TO AN AUTHORIZED DEALER ON AN AGREED UPON SERVICE DATEAND THE REMEDY IS NOT PROVIDED WITHIN A REASONABLE TIME AND FREE OF CHARGE ORTHE REMEDY DOES NOT CORRECT THE DEFECT OR NONCOMPLIANCE, PLEASE CONTACT COOPERSERVICE CENTER AT 1-800-854-6288. ALSO CONTACT THE NATIONAL HIGHWAY TRAFFICSAFETY ADMINISTRATION'S AUTO SAFETY HOTLINE AT 1-800-424-9393.



ODI RESUME

INVESTIGATION: PE94-071
SUBJECT : Michelin Tire Failure
PROMPTED BY : Consumer complaints

DATE OPENED: 03-OCT-94

PRINCIPAL ENGINEER: PL Moore

MANUFACTURER : Michelin
MODEL(S) : Model XW4 Tires
MODEL YR : All
VEHICLE POPULATION: unknown

SYNOPSIS: Reports allege tire blow out, tread separation or side wall failure.

FAILURE REPORT SUMMARY

BASIS:	ODI	MANUFACTURER	TOTAL
COMPLAINTS:	5	NA	5
FIRES:	0	NA	0
INJ ACCID:	0	NA	0
# INJURIES:	0	NA	0
FAT ACCID:	0	NA	0
# FATALS:	0	NA	0
OTHER:	0	NA	0

DESCRIPTION OF OTHER:

ACTION: Open a Preliminary Evaluation.

BRCH CHF
10/3/94
DATE

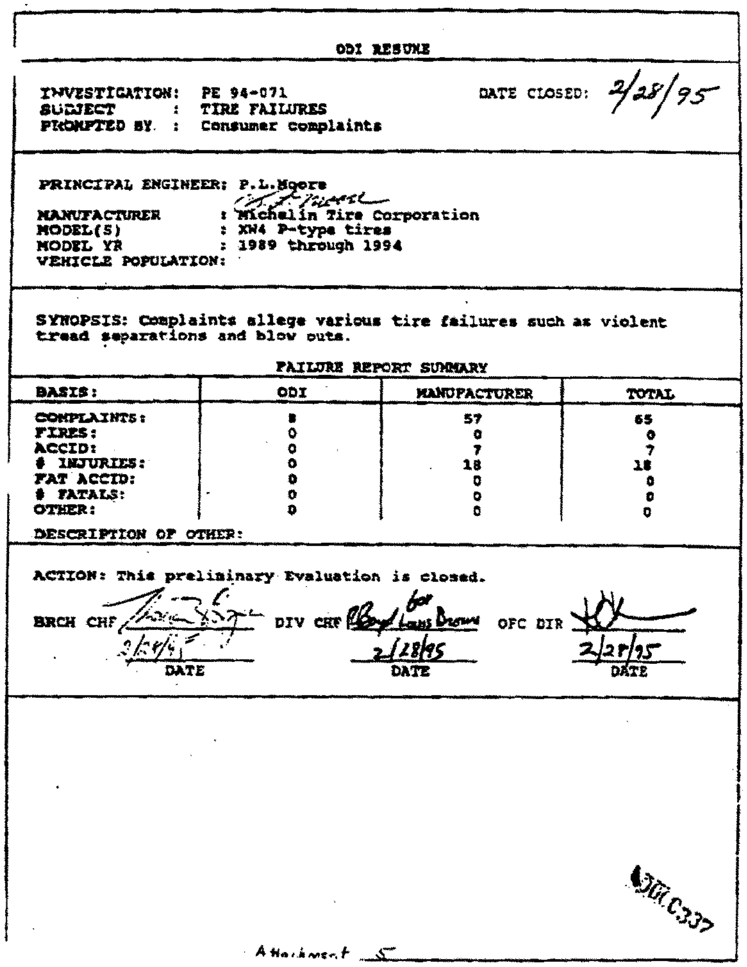
DIV CHF
10/3/94
DATE

Acting
OFC DIR
10/3/94
DATE

SUMMARY: The subject tire is identified in one complaint that alleges the tire tread separated with sufficient energy to penetrate the vehicle's interior. The report describes the event as a violent incident propelling parts of the tire and wheel well into the back seat and storage area. Four other complaints report either blow out or defects in the side wall.

000103

Called Padula
Steve 10/3/94



ODI RESUME

INVESTIGATION: PE 94-071
SUBJECT : TIRE FAILURES
PROMPTED BY : Consumer complaints

DATE CLOSED: 2/28/95

PRINCIPAL ENGINEER: P.L.Moore

MANUFACTURER : Michelin Tire Corporation
MODEL(S) : XW4 P-type tires
MODEL YR : 1989 through 1994
VEHICLE POPULATION:

SYNOPSIS: Complaints allege various tire failures such as violent tread separations and blow outs.

FAILURE REPORT SUMMARY

BASIS:	ODI	MANUFACTURER	TOTAL
COMPLAINTS:	8	57	65
FIRES:	0	0	0
ACCID:	0	7	7
# INJURIES:	0	18	18
FAT ACCID:	0	0	0
# FATALS:	0	0	0
OTHER:	0	0	0

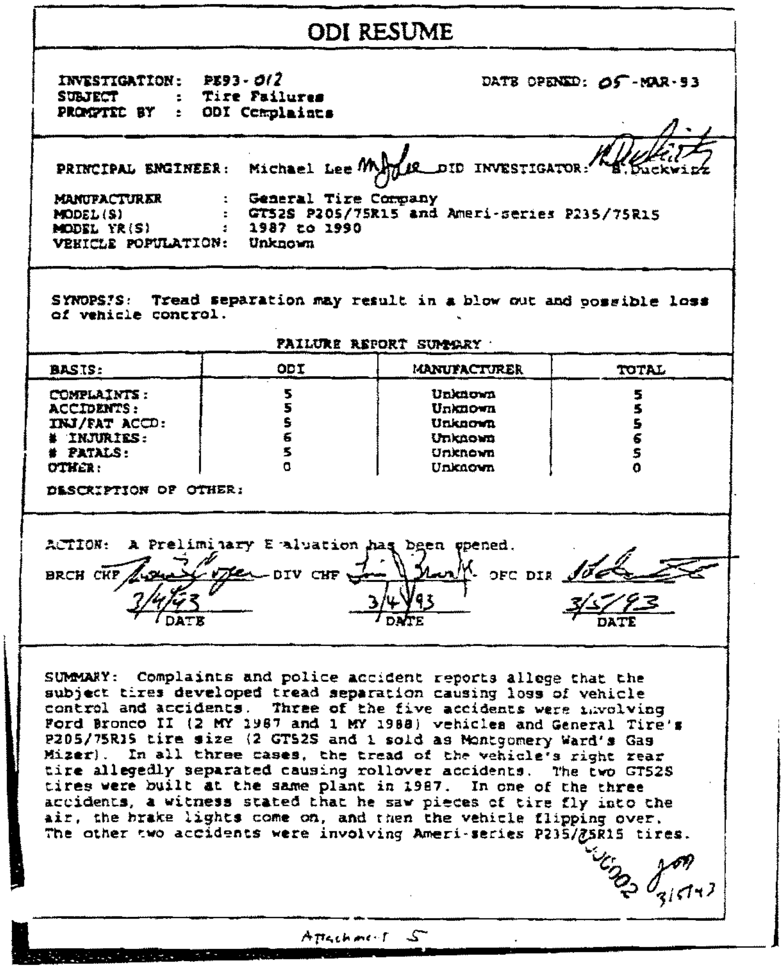
DESCRIPTION OF OTHER:

ACTION: This preliminary Evaluation is closed.

BRCH CHF ______ DIV CHF for Louis Brown OFC DIR ______
2/28/95 DATE 2/28/95 DATE 2/28/95 DATE

001C337

Attachment 5



ODI RESUME

INVESTIGATION: PE93-012 DATE OPENED: 05-MAR-93
SUBJECT : Tire Failures
PROMPTED BY : ODI Complaints

PRINCIPAL ENGINEER: Michael Lee ODI INVESTIGATOR: B.Duckwitz

MANUFACTURER : General Tire Company
MODEL(S) : GT52S P205/75R15 and Ameri-series P235/75R15
MODEL YR(S) : 1987 to 1990
VEHICLE POPULATION: Unknown

SYNOPSIS: Tread separation may result in a blow out and possible loss of vehicle control.

FAILURE REPORT SUMMARY

BASIS:	ODI	MANUFACTURER	TOTAL
COMPLAINTS:	5	Unknown	5
ACCIDENTS:	5	Unknown	5
INJ/FAT ACCD:	5	Unknown	5
# INJURIES:	6	Unknown	6
# FATALS:	5	Unknown	5
OTHER:	0	Unknown	0

DESCRIPTION OF OTHER:

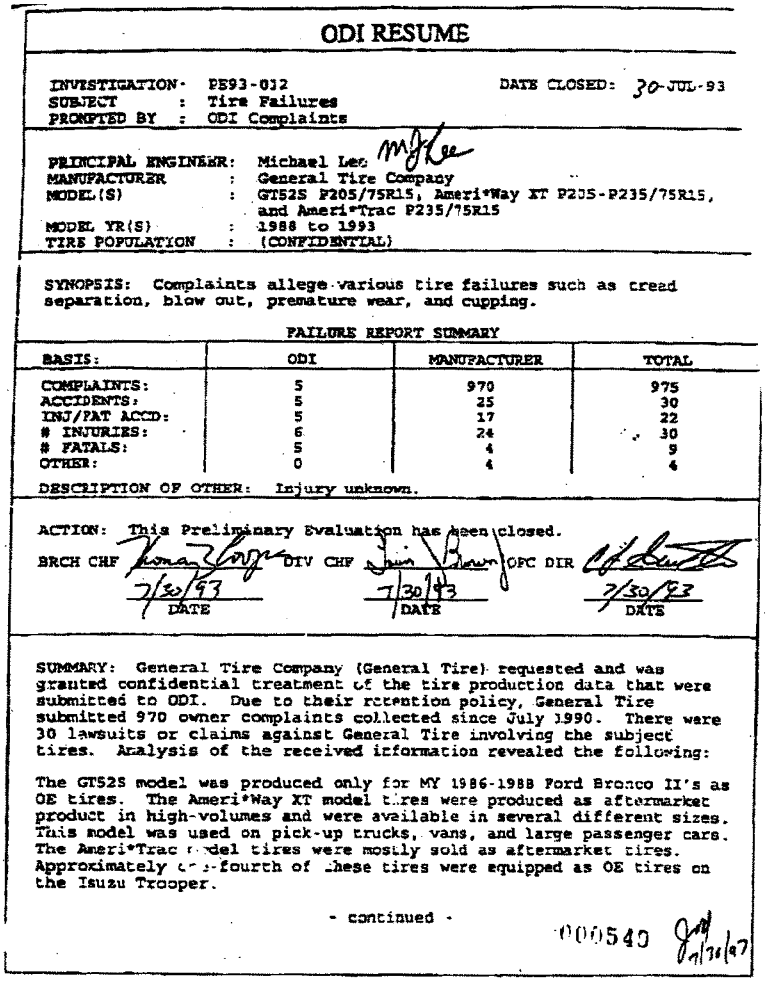
ACTION: A Preliminary Evaluation has been opened.

BRCH CHF 3/4/93 DATE
DIV CHF 3/4/93 DATE
OFC DIR 3/5/93 DATE

SUMMARY: Complaints and police accident reports allege that the subject tires developed tread separation causing loss of vehicle control and accidents. Three of the five accidents were involving Ford Bronco II (2 MY 1987 and 1 MY 1988) vehicles and General Tire's P205/75R15 tire size (2 GT52S and 1 sold as Montgomery Ward's Gas Mizer). In all three cases, the tread of the vehicle's right rear tire allegedly separated causing rollover accidents. The two GT52S tires were built at the same plant in 1987. In one of the three accidents, a witness stated that he saw pieces of tire fly into the air, the brake lights come on, and then the vehicle flipping over. The other two accidents were involving Ameri-series P235/75R15 tires.

JC002 3/5/93

Attachment 5



ODI RESUME

INVESTIGATION: PE93-032
SUBJECT : Tire Failures
PROMPTED BY : ODI Complaints

DATE CLOSED: 30-JUL-93

PRINCIPAL ENGINEER: Michael Lee MJLee
MANUFACTURER : General Tire Company
MODEL(S) : GT52S P205/75R15, Ameri*Way XT P205-P235/75R15, and Ameri*Trac P235/75R15
MODEL YR(S) : 1988 to 1993
TIRE POPULATION : (CONFIDENTIAL)

SYNOPSIS: Complaints allege various tire failures such as tread separation, blow out, premature wear, and cupping.

FAILURE REPORT SUMMARY

BASIS:	ODI	MANUFACTURER	TOTAL
COMPLAINTS:	5	970	975
ACCIDENTS:	5	25	30
INJ/FAT ACCD:	5	17	22
# INJURIES:	6	24	30
# FATALS:	5	4	9
OTHER:	0	4	4

DESCRIPTION OF OTHER: Injury unknown.

ACTION: This Preliminary Evaluation has been closed.

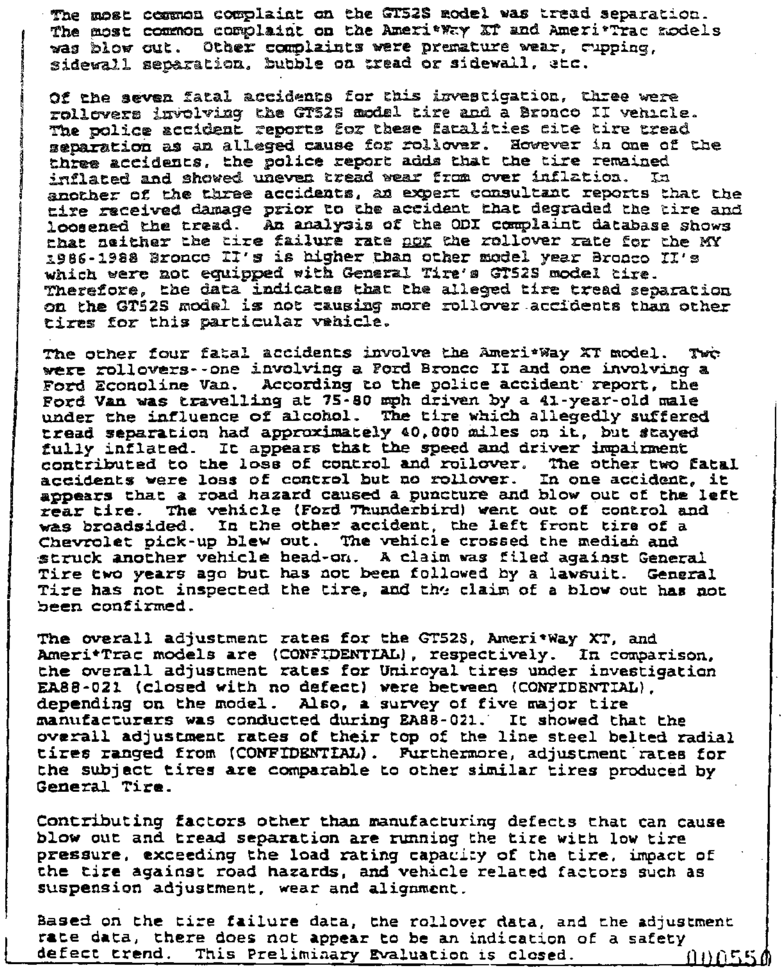
BRCH CHF 7/30/93 DATE
DIV CHF 7/30/93 DATE
OFC DIR 7/30/93 DATE

SUMMARY: General Tire Company (General Tire) requested and was granted confidential treatment of the tire production data that were submitted to ODI. Due to their retention policy, General Tire submitted 970 owner complaints collected since July 1990. There were 30 lawsuits or claims against General Tire involving the subject tires. Analysis of the received information revealed the following:

The GT52S model was produced only for MY 1986-1988 Ford Bronco II's as OE tires. The Ameri*Way XT model tires were produced as aftermarket product in high-volumes and were available in several different sizes. This model was used on pick-up trucks, vans, and large passenger cars. The Ameri*Trac model tires were mostly sold as aftermarket tires. Approximately one-fourth of these tires were equipped as OE tires on the Isuzu Trooper.

- continued -

7/31/97



The most common complaint on the GT52S model was tread separation. The most common complaint on the Ameri*Way XT and Ameri*Trac models was blow out. Other complaints were premature wear, cupping, sidewall separation, bubble on tread or sidewall, etc.

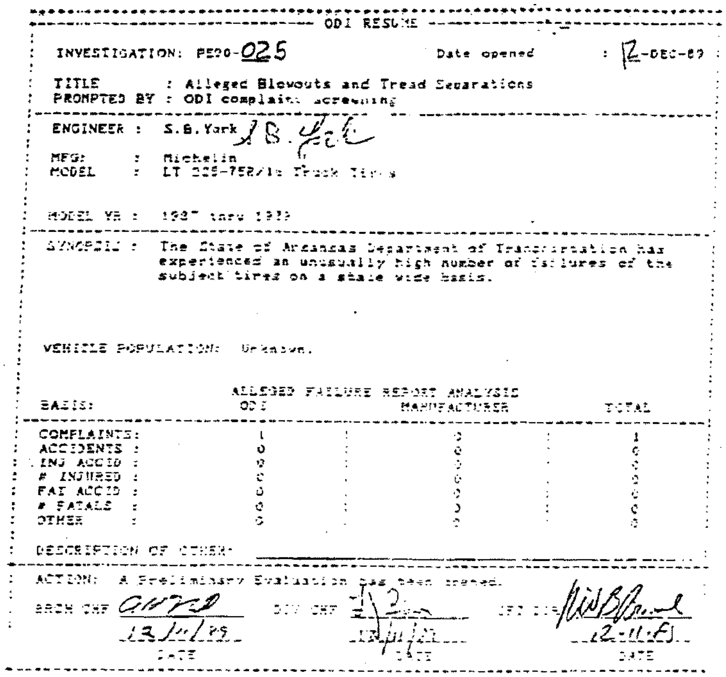
Of the seven fatal accidents for this investigation, three were rollovers involving the GT52S model tire and a Bronco II vehicle. The police accident reports for these fatalities cite tire tread separation as an alleged cause for rollover. However in one of the three accidents, the police report adds that the tire remained inflated and showed uneven tread wear from over inflation. In another of the three accidents, an expert consultant reports that the tire received damage prior to the accident that degraded the tire and loosened the tread. An analysis of the ODI complaint database shows that neither the tire failure rate nor the rollover rate for the MY 1986-1988 Bronco II's is higher than other model year Bronco II's which were not equipped with General Tire's GT52S model tire. Therefore, the data indicates that the alleged tire tread separation on the GT52S model is not causing more rollover accidents than other tires for this particular vehicle.

The other four fatal accidents involve the Ameri*Way XT model. Two were rollovers--one involving a Ford Bronco II and one involving a Ford Econoline Van. According to the police accident report, the Ford Van was travelling at 75-80 mph driven by a 41-year-old male under the influence of alcohol. The tire which allegedly suffered tread separation had approximately 40,000 miles on it, but stayed fully inflated. It appears that the speed and driver impairment contributed to the loss of control and rollover. The other two fatal accidents were loss of control but no rollover. In one accident, it appears that a road hazard caused a puncture and blow out of the left rear tire. The vehicle (Ford Thunderbird) went out of control and was broadsided. In the other accident, the left front tire of a Chevrolet pick-up blew out. The vehicle crossed the median and struck another vehicle head-on. A claim was filed against General Tire two years ago but has not been followed by a lawsuit. General Tire has not inspected the tire, and the claim of a blow out has not been confirmed.

The overall adjustment rates for the GT52S, Ameri*Way XT, and Ameri*Trac models are (CONFIDENTIAL), respectively. In comparison, the overall adjustment rates for Uniroyal tires under investigation EA88-021 (closed with no defect) were between (CONFIDENTIAL), depending on the model. Also, a survey of five major tire manufacturers was conducted during EA88-021. It showed that the overall adjustment rates of their top of the line steel belted radial tires ranged from (CONFIDENTIAL). Furthermore, adjustment rates for the subject tires are comparable to other similar tires produced by General Tire.

Contributing factors other than manufacturing defects that can cause blow out and tread separation are running the tire with low tire pressure, exceeding the load rating capacity of the tire, impact of the tire against road hazards, and vehicle related factors such as suspension adjustment, wear and alignment.

Based on the tire failure data, the rollover data, and the adjustment rate data, there does not appear to be an indication of a safety defect trend. This Preliminary Evaluation is closed.



ODI RESUME

INVESTIGATION: PE90-025 Date opened : 12-DEC-89

TITLE : Alleged Blowouts and Tread Separations
PROMPTED BY : ODI complaint screening

ENGINEER : S.B. York S.B. York

MFG: : Michelin
MODEL : LT 235-75R/15 Truck Tires

MODEL YR : 1987 thru 1989

SYNOPSIS : The State of Arkansas Department of Transportation has experienced an unusually high number of failures of the subject tires on a state wide basis.

VEHICLE POPULATION: Unknown.

ALLEGED FAILURE REPORT ANALYSIS

BASIS:	ODI	MANUFACTURER	TOTAL
COMPLAINTS:	1	0	1
ACCIDENTS :	0	0	0
INJ ACCID :	0	0	0
# INJURED :	0	0	0
FAT ACCID :	0	0	0
# FATALS :	0	0	0
OTHER :	0	0	0

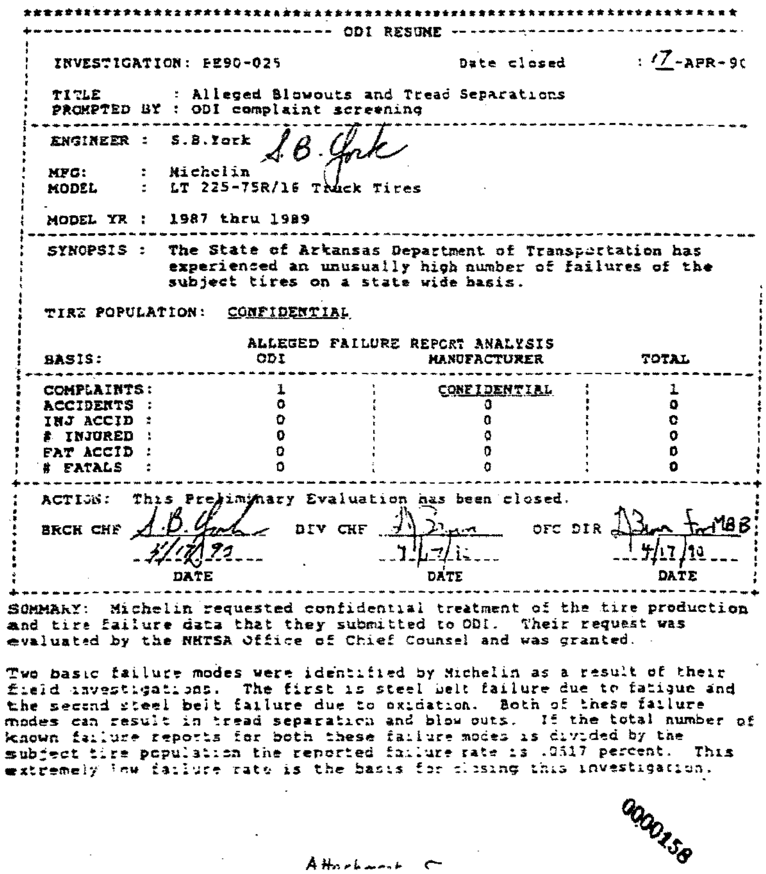
DESCRIPTION OF OTHER: ____________

ACTION: A Preliminary Evaluation has been opened.

BRCH CHF ____ 12/11/89 DATE
DIV CHF ____ 12/11/89 DATE
OFF DIR ____ 12-11-89 DATE

0000102

Attachment 5



ODI RESUME

INVESTIGATION: PE90-025 Date closed : 17-APR-9

TITLE : Alleged Blowouts and Tread Separations
PROMPTED BY : ODI complaint screening

ENGINEER : S.B.York S.B. York

MFG: : Michelin
MODEL : LT 225-75R/16 Truck Tires

MODEL YR : 1987 thru 1989

SYNOPSIS : The State of Arkansas Department of Transportation has experienced an unusually high number of failures of the subject tires on a state wide basis.

TIRE POPULATION: CONFIDENTIAL

ALLEGED FAILURE REPORT ANALYSIS

BASIS:	ODI	MANUFACTURER	TOTAL
COMPLAINTS:	1	CONFIDENTIAL	1
ACCIDENTS :	0	0	0
INJ ACCID :	0	0	0
# INJURED :	0	0	0
FAT ACCID :	0	0	0
# FATALS :	0	0	0

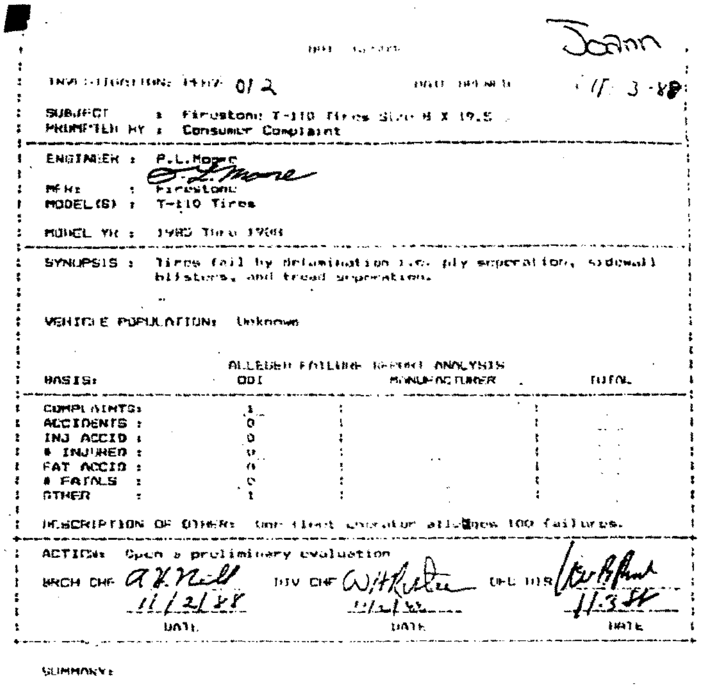
ACTION: This Preliminary Evaluation has been closed.

BRCH CHF S.B. York 4/17/90 DATE
DIV CHF 4/17/90 DATE
OFC DIR for MBB 4/17/90 DATE

SUMMARY: Michelin requested confidential treatment of the tire production and tire failure data that they submitted to ODI. Their request was evaluated by the NHTSA Office of Chief Counsel and was granted.

Two basic failure modes were identified by Michelin as a result of their field investigations. The first is steel belt failure due to fatigue and the second steel belt failure due to oxidation. Both of these failure modes can result in tread separation and blow outs. If the total number of known failure reports for both these failure modes is divided by the subject tire population the reported failure rate is .0517 percent. This extremely low failure rate is the basis for closing this investigation.

Attachment C



[illegible] Joann

INVESTIGATION: PE88- 012 DATE OPENED 11-3-88

SUBJECT : Firestone T-110 Tires Size 8 X 19.5

PROMPTED BY : Consumer Complaint

ENGINEER : P.L.Moore
P.L. Moore

MFR : Firestone

MODEL(S) : T-110 Tires

MODEL YR : 1985 Thru 1988

SYNOPSIS : Tires fail by delamination i.e. ply seperation, sidewall blisters, and tread seperation.

VEHICLE POPULATION: Unknown

ALLEGED FAILURE REPORT ANALYSIS

BASIS:	ODI	MANUFACTURER	TOTAL
COMPLAINTS:	1		
ACCIDENTS :	0		
INJ ACCID :	0		
# INJURED :	0		
FAT ACCID :	0		
# FATALS :	0		
OTHER :	1		

DESCRIPTION OF OTHER: One fleet operator alleges 100 failures.

ACTION: Open a preliminary evaluation

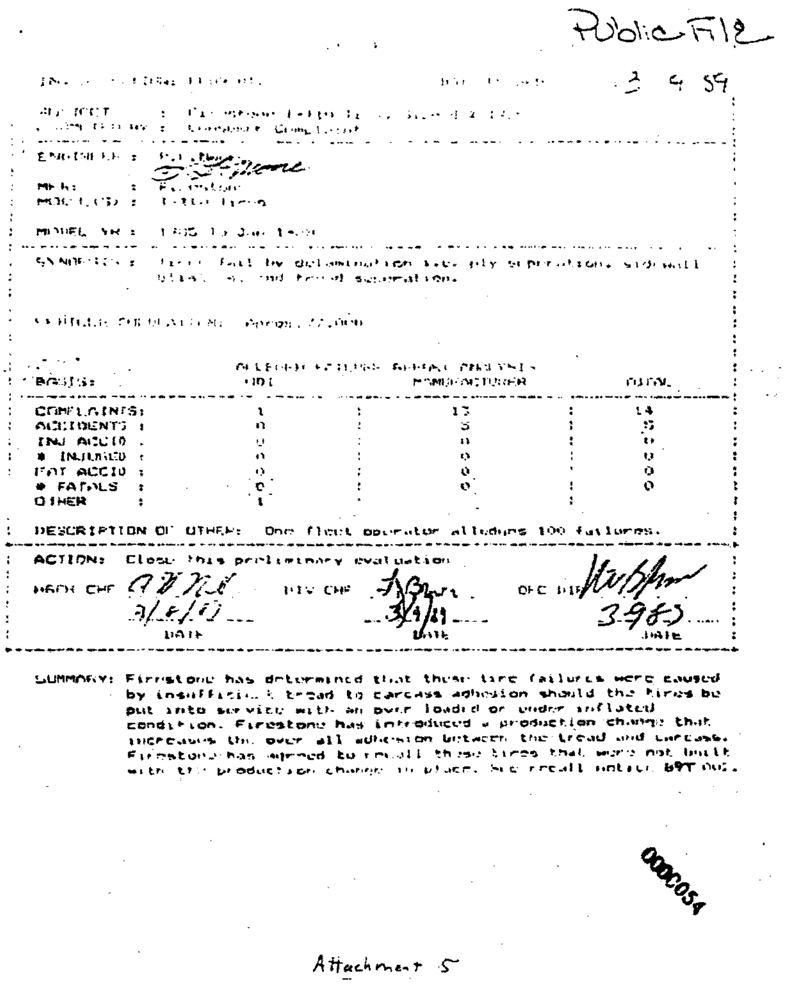
BRCH CHF 11/2/88 DATE

DIV CHF 11/2/88 DATE

OFC DIR 11.3.88 DATE

SUMMARY:

Attachment 5



Public File

[illegible] 3 9 83

[illegible] : [illegible]

[illegible] : [illegible] Complaint

ENGINEER : [illegible]

MFR : Firestone

MODEL(S) : [illegible] tires

MODEL YR : [illegible]

SYNOPSIS : Tires fail by delamination [illegible] ply separation, sidewall [illegible] and tread separation.

[illegible] : Approx. [illegible]

BASIS:	ODI	MANUFACTURER	TOTAL
COMPLAINTS:	1	13	14
ACCIDENTS :	0	5	5
INJ ACCID :	0	0	0
# INJURED :	0	0	0
FAT ACCID :	0	0	0
# FATALS :	0	0	0
OTHER :	1		

DESCRIPTION OF OTHER: One fleet operator alleging 100 failures.

ACTION: Close this preliminary evaluation

[illegible] CHF 3/8/83 DATE DIV CHF 3/9/83 DATE OFC DIR 3-9-83 DATE

SUMMARY: Firestone has determined that these tire failures were caused by insufficient tread to carcass adhesion should the tires be put into service with an over loaded or under inflated condition. Firestone has introduced a production change that increases the over all adhesion between the tread and carcass. Firestone has agreed to recall those tires that were not built with the production change in place. See recall notice 89T [illegible].

000054

Attachment 5

Phone log with the complainants:
Person Calling: Rob Wahl

2/2/00
ODI#709615:Mr. [redacted] son was driving his Ford Explorer at 60-65 mph down the highway in Mesa, AZ at approximately 10pm when he felt a bump followed by a bang sound. He thought someone had hit the car. The car started to pull to the left, but he was able to maintain control of the vehicle and pull off the road. The tread on the tire was missing but the tire was still inflated, so he was able to drive to the next exit ramp

2/1/00
ODI#839534:Mrs. [redacted] was driving her Ford Explorer down the highway at approximately 70 mph when the tread came off one of her rear tires. As she was attempting to slow down, the tread wrapped around the axel and caused the vehicle to flip twice end over end and land on its hood. The tire still had air in it after the crash. The front tires had just been replaced by the dealer due to thin tread, but the back tires were not checked.

2/7/00
ODI#605558:Ms. [redacted] was driving on the highway at approx. 68mph in the evening when her right front tire blew out. She was able to pull the car to the side of the road. There was some tread separation.

2/2/00
ODI#841646:Mr. [redacted] was driving down the highway in Texas at approximately 70 mph when the tread came off one of his tires. He was attempting to slow the vehicle down and pull to the side of the road when the vehicle and trailer it was towing tipped on their side. He suffered minor head trauma and his wife received a broken pelvis. Mr. [redacted] later contacted Firestone about the incident. They carried out an investigation, sent the tire and tread to their lab, and settled with Mr. [redacted] for his insurance deductables. Mr. [redacted] also had a similar incident with a firestone tire where the tread came off causing $500 damage to his car and loss of the tire. Firestone replaced the first tire at no charge.

2/1/00
ODI#844304: Mr. [redacted] was driving down the interstate in Utah at approximately 70-75 mph when he felt a vibration in his vehicle. He realized the entire vehicle was vibrating, and moments later the tire's tread came apart causing loss of control of his vehicle. He spun 180 degrees and crashed into an embankment on the side of the highway. When he had the vehicle repaired, the dealer had heard of several other instances of failure in the same vehicle and same tires. Dealer cited high temperatures of Arizona desert as reason for failure.

2/7/00
ODI#517909: Mrs. [redacted] was driving to Miami on the highway when she felt the car shake as if she had a flat. She pulled over and chekc the tires, but nothing appeared to be wrong, so she continued. A few minutes later, both right tires had a blowout, and her vehicle was slammed into the median wall. The vehicle then hit the guardrail on the other side of the highway, and then spun several times before coming to a stop. No one was injured. She replaced the tires and had another blowout approximately two weeks later. This time her husband was able to pull off the road. In both cases she was traveling at approximately 70 mph. She reported hearing of two other accidents in the area, each involving a fatality.

2/23/00
ODI#856586: Mr. [redacted] was driving at about 50mph when the tread separated from his Firestone ATX tires. He was able to maintain control of the isuzu trooper, and the tire was still inflated

2/23/00
ODI#856917: Mr. [redacted] was driving on the highway in his 1996 Ford Explorer at about 70mph when the tread separated om his tire. He lost control of the vehicle and it flipped twice, landing upright. He suffered minor injuries. The tire was still inflated when checked.

Attachment 6 -

REDACTED

2/28/00
ODI#856664: Ms. [redacted] experienced 2 blowouts on the right rear tire of her 1992 Ford Explorer. They were both Firestone ATX tires. The first blowout happened as she was merging onto the highway. she felt a lack of response from the vehicle and pulled to the side to find out that her tire had blown In the second case, she was driving at about 70mph on the highway when she felt the same thing. She was also able to pull to the side in this case. She doesn't recall hearing any sound wither time.

2/28/00
ODI#718816: Mr. [redacted] wife was driving their Ford Explorer down the highway at about 70mph. The car suddenly became difficult to control, but she was able to maintain control and pull over to the shoulder. About half the tread had come off the tire. Mr. [redacted] took the tires to a Discount Tire store to have them fixed where he was told that many people were having the same problems with the ATX tire. The mechanic claimed that the tread was too durable and it lasted longer than the rest of the tire. The rest of the tire would dry rot causing failure.

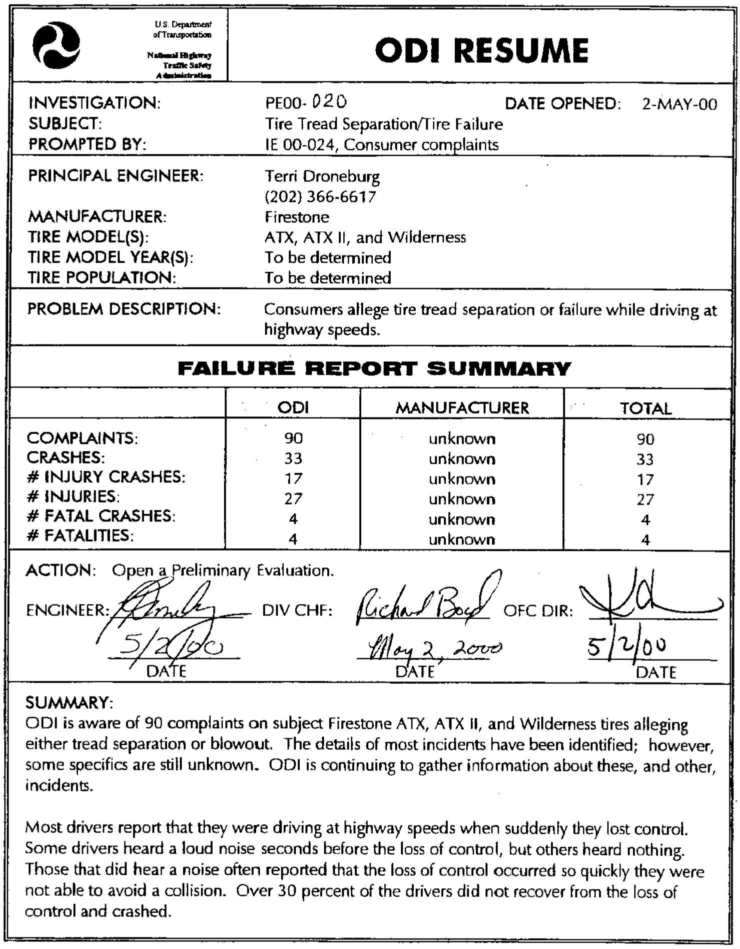
2/8/00
ODI#856553:Ms. [redacted] was driving in her Ford Explorer at about 70mph when the tread separated. She lost control of the vehicle and spun several times before stopping. No one was injured. The tire on the vehicle was about 3 months old at the time of failure. The previous tire had the same problem. Firestone reimbursed Ms. [redacted] for the failed tire, but refused to replace the others on the vehicle.

2/29/00
ODI#719177: Ms. [redacted] was driving down the interestate at about 60mph in her ford Explorer when she heard an explosion. the vehicle started to pull to the right and when she tried to compensate the car flipped and rolled over. It was later found that the tread on the left rear tire had separated. Ms. [redacted] suffered minor injuries. The tires had 86,000 miles on them and were the originals.

2/29/00
ODI#857342: Mr. [redacted] was driving his 1996 Ford Explorer at 70mph when he heard a loud noise. the tread had come off his right rear tire, and he flipped several times and landed on the shoulder on the opposite side of the highway. He suffered a broken collar bone. He regularly checked the pressure and used the specifications in the manual. The tires were OEM.

Attachment 6

REDACTED



U.S. Department of Transportation
National Highway Traffic Safety Administration

ODI RESUME

INVESTIGATION: PE00-020 DATE OPENED: 2-MAY-00
SUBJECT: Tire Tread Separation/Tire Failure
PROMPTED BY: IE 00-024, Consumer complaints

PRINCIPAL ENGINEER: Terri Droneburg
(202) 366-6617
MANUFACTURER: Firestone
TIRE MODEL(S): ATX, ATX II, and Wilderness
TIRE MODEL YEAR(S): To be determined
TIRE POPULATION: To be determined

PROBLEM DESCRIPTION: Consumers allege tire tread separation or failure while driving at highway speeds.

FAILURE REPORT SUMMARY

	ODI	MANUFACTURER	TOTAL
COMPLAINTS:	90	unknown	90
CRASHES:	33	unknown	33
# INJURY CRASHES:	17	unknown	17
# INJURIES:	27	unknown	27
# FATAL CRASHES:	4	unknown	4
# FATALITIES:	4	unknown	4

ACTION: Open a Preliminary Evaluation.

ENGINEER: DIV CHF: Richard Boyd OFC DIR:

5/2/00 May 2, 2000 5/2/00
DATE DATE DATE

SUMMARY:
ODI is aware of 90 complaints on subject Firestone ATX, ATX II, and Wilderness tires alleging either tread separation or blowout. The details of most incidents have been identified; however, some specifics are still unknown. ODI is continuing to gather information about these, and other, incidents.

Most drivers report that they were driving at highway speeds when suddenly they lost control. Some drivers heard a loud noise seconds before the loss of control, but others heard nothing. Those that did hear a noise often reported that the loss of control occurred so quickly they were not able to avoid a collision. Over 30 percent of the drivers did not recover from the loss of control and crashed.

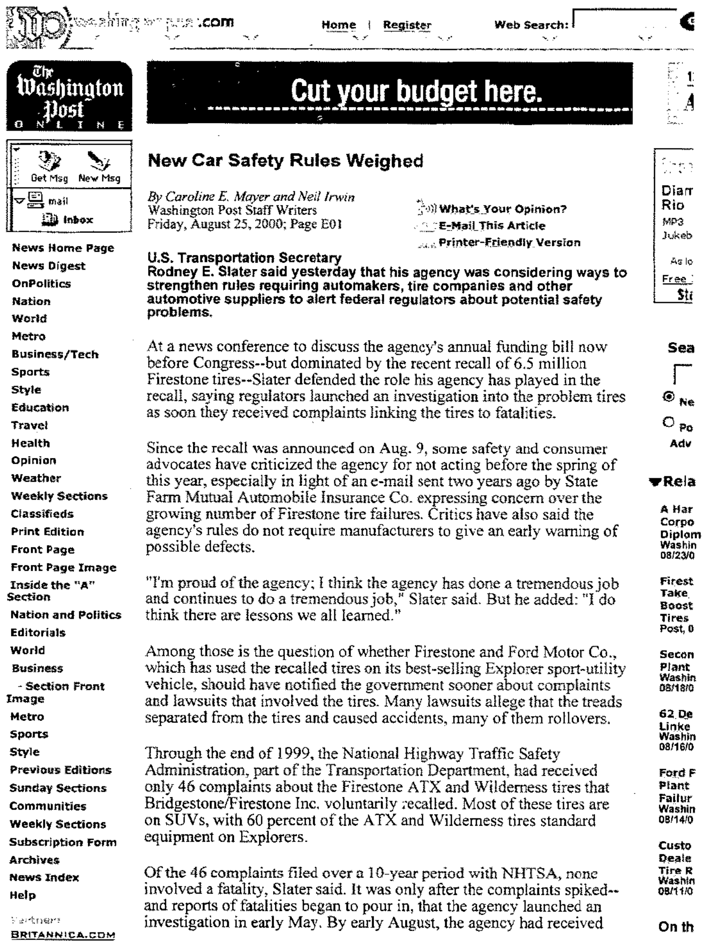
After analyzing complaints and contacting consumers, ODI knows of 65 consumers alleging a complete (61) or partial (4) tire tread separation occurred on a subject tire. An additional 17 allege a blow out occurred, which may or may not have been preceded by a tread separation. The remaining eight indicate unspecified tire failures. Twenty-eight of the drivers who experienced an alleged tread separation noted that the tire remained inflated, often after a subsequent crash. In fact, 22 of the 28 cases, resulted in a crash. In two of these crashes, the tread wrapped itself around the rear axle, allegedly causing a wheel lockup and the resultant crash.

Forty-one of the complainants reported a tire tread separated while traveling at speeds ranging from 50 to 75 mph, with 70 mph being the most commonly reported speed, cited by 18 drivers.

The subject tires were installed as original equipment (OEM) on certain Ford Explorer, Ranger, and F150 vehicles (among others) and were also available as replacement tires for these and other vehicles. Forty-one reports allege that an OEM tire failed and ten owners claim the failure involved a replacement tire.

ODI has documented 34 crashes with 21 resulting in an injury or death. In many cases, more than one occupant was injured in the crash (i.e., 27 injuries resulted from 17 of the crashes). Many of the injuries were relatively minor (i.e., lacerations, scrapes, and a bloody nose). However, 5 of the reports involved severe injuries including head trauma and broken bones. The remaining four crashes resulted in one occupant fatality each.

Finally, a strong geographical trend is noted at this time. Forty-three complaints are from Texas with over 80% of the balance involving Arizona, Florida, Alabama, Louisiana, South Carolina, Nevada, New Mexico, Oklahoma, Utah, and southern California.



New Car Safety Rules Weighed

By Caroline E. Mayer and Neil Irwin
Washington Post Staff Writers
Friday, August 25, 2000; Page E01

U.S. Transportation Secretary Rodney E. Slater said yesterday that his agency was considering ways to strengthen rules requiring automakers, tire companies and other automotive suppliers to alert federal regulators about potential safety problems.

At a news conference to discuss the agency's annual funding bill now before Congress--but dominated by the recent recall of 6.5 million Firestone tires--Slater defended the role his agency has played in the recall, saying regulators launched an investigation into the problem tires as soon they received complaints linking the tires to fatalities.

Since the recall was announced on Aug. 9, some safety and consumer advocates have criticized the agency for not acting before the spring of this year, especially in light of an e-mail sent two years ago by State Farm Mutual Automobile Insurance Co. expressing concern over the growing number of Firestone tire failures. Critics have also said the agency's rules do not require manufacturers to give an early warning of possible defects.

"I'm proud of the agency; I think the agency has done a tremendous job and continues to do a tremendous job," Slater said. But he added: "I do think there are lessons we all learned."

Among those is the question of whether Firestone and Ford Motor Co., which has used the recalled tires on its best-selling Explorer sport-utility vehicle, should have notified the government sooner about complaints and lawsuits that involved the tires. Many lawsuits allege that the treads separated from the tires and caused accidents, many of them rollovers.

Through the end of 1999, the National Highway Traffic Safety Administration, part of the Transportation Department, had received only 46 complaints about the Firestone ATX and Wilderness tires that Bridgestone/Firestone Inc. voluntarily recalled. Most of these tires are on SUVs, with 60 percent of the ATX and Wilderness tires standard equipment on Explorers.

Of the 46 complaints filed over a 10-year period with NHTSA, none involved a fatality, Slater said. It was only after the complaints spiked--and reports of fatalities began to pour in, that the agency launched an investigation in early May. By early August, the agency had received more than 770 complaints, with reports of 62 deaths and more than 100 injuries.

Firest
Bridg

Slater added that State Farm's 1998 e-mail cited 21 incidents but no fatalities. That "was something that didn't grab our attention," he said, but he added that in the future the agency will watch more closely for such trends.

Under NHTSA rules, manufacturers are required to notify the government when they have concluded there is a safety defect in their equipment. And Firestone has never reached that official conclusion. To date, it maintains that the tires have failed because consumers have either improperly maintained them or not kept them adequately inflated to the recommended tire pressure.

Auto manufacturers are not required to tell the government about lawsuits filed against them--and there have been about 100 involving ATX and Wilderness tires, the earliest filed in 1992. Nor do they have to notify regulators about large numbers of consumer complaints.

Slater said the agency is now considering "these kinds of issues" to see if the government should receive earlier notification of potential problems. He declined to be more specific.

While saying he "didn't want to get into pointing fingers," Slater did express concern over Ford's failure to notify NHTSA that it was replacing thousands of tires on sport-utility vehicles overseas in the past year. NHTSA does not require that overseas actions be reported.

But, Slater said: "I think there is a question about timing here. We should have known about the recalls in other countries."

At this point, Slater said the problem seems solely a "tire issue" and does not appear to involve Ford Explorers.

NHTSA Administrator Sue Bailey, serving her first week on the job, said the agency's investigation continues and may take six months. The agency is looking at all ATX and Wilderness tires, not just the ones covered by the recall (all 15-inch ATX tires and all 15-inch Wilderness tires that were made in Firestone's Decatur plant).

"We continue to investigate whether others should be recalled," said Ken Weinstein, NHTSA's associate administrator for safety assurance. As part of its investigation, the agency has requested information from Goodyear Tire & Rubber Co. on similar tires. In the mid-1990s, Goodyear made 2.3 million tires for the Explorer. There have been no complaints of tread separation on those tires. Weinstein said Goodyear was not under investigation; the agency simply wanted to learn about its experience with the same size of tire.

Within the next two weeks, NHTSA also plans to ask other carmakers for data on their experience with Firestone tires on SUVs, Weinstein said.

Meanwhile, the agency directed Firestone to make changes in the recall letter it is planning to send its customers to make it clear what the problem is, its consequence and how it can be corrected--by Firestone's competitors as well as Firestone dealers. Both NHTSA and Firestone officials declined to discuss the changes.

Ford executives said yesterday that 861,874 tires--about 13 percent of the recalled tires--have already been replaced.

In a conference call with reporters, company officials also tried to play down recent reports that when Explorer tires are inflated to high pressures, it increases the risk of a vehicle rollover, a risk that engineers described in internal memos. Firestone has said the tires are less likely to experience tread separation when they are inflated to a tire pressure of 30 pounds per square inch, but Ford recommended lower pressures of 26 psi.

The Ford executives stressed that the memos were written by engineers in the middle stages of vehicle design. Helen Petrauskas, Ford's vice president of environmental and safety engineering, said the memos show "engineers worrying about making this vehicle as good as they possibly can." She said: "Somehow that was held against us, that our engineers are worrying about the performance of the vehicle. That's what engineers are paid to do."

In the end, she added, the car that was made met all safety requirements.

Ford and Firestone officials--as well as Slater and Bailey--have been asked to testify next month in hearings called by Senate Commerce Committee Chairman John McCain (R-Ariz). Today, staff members from the House Commerce Committee, headed by Rep. Thomas J. Bliley Jr. (R-Va.), were to travel to Ford's headquarters in Michigan to discuss the issue with company officials.

Slater said he welcomed the congressional probes as an opportunity to explore whether the agency needs additional enforcement authority.

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U.S. Department
of Transportation

National Highway
Traffic Safety
Administration

400 Seventh Street, S.W.
Washington, D.C. 20590

CONSUMER ADVISORY

FOR IMMEDIATE RELEASE

NHTSA Contact: Rae Tyson
(202) 366-9550

The National Highway Traffic Safety Administration (NHTSA) is recommending that owners of vehicles with certain models and sizes of Firestone tires not already being recalled by Firestone take a number of actions to assure their safety, based on NHTSA's analysis of Firestone's data.

On May 2, 2000, NHTSA opened a defect investigation into approximately 47 million ATX, ATXII, and Wilderness tires manufactured by Bridgestone/Firestone, Inc. (Firestone). On August 9, Firestone announced that it was recalling 14.4 million of the tires under investigation. These include all Firestone ATX and ATXII tires of the P235/75R15 size manufactured since 1991 and all Wilderness AT tires of that same size manufactured at Firestone's Decatur, IL plant. Firestone has estimated that about 6.5 million of these tires were still in service as of that date.

NHTSA has continued its investigation into the remaining tires. As part of that investigation, NHTSA has reviewed data provided by Firestone on property damage claims, personal injury claims, and lawsuits regarding the tires under investigation. Although its investigation is not complete, that review indicated that the rate of tread separations for certain other tire models and sizes exceed those of the recalled tires, sometimes by a large margin. Therefore, NHTSA is concerned about the possible safety risk associated with those tires.

On August 30, 2000, NHTSA staff met with Firestone representatives in Washington and recommended that Firestone expand the recall to include these tire models. On August 31, Firestone advised NHTSA that it would not voluntarily expand the recall at this time. We are continuing our investigation, which may result in an order directing Firestone to recall these tires and any other defective tires. However, in view of the potential safety risk, NHTSA believes that it is important to alert the public of its concerns now.

The tire models with the high tread separation rates are set out in an Attachment to this advisory. A total of approximately 1.4 million of these tires were produced. However, since many of them were manufactured many years ago, it is likely that far fewer are currently on the road. Most of them were sold as replacement equipment and were not installed as original tires on new cars.

DOT AUTO SAFETY HOTLINE
1-888-DASH-2-DOT

Since Firestone has chosen not to expand the recall at this time, you may not be able to obtain free replacement tires from Firestone. However, in light of these concerns, NHTSA recommends that you consider replacing the tires in question and that you retain all documentation.

If you have one of these tires on your vehicle, you should take the following steps:

- Check your tires to be sure there are no visible signs of a problem.
- Be sure your tires are properly inflated.
- Do not drive at a high rate of speed, particularly in hot weather. If possible, choose roads with relatively low speed limits.
- Make sure your vehicle is not overloaded.
- Wear your seatbelt.

Please be aware that while these precautions are good general guidelines to tire safety, they may not prevent a tire failure.

NHTSA will be moving to rapidly complete its defect investigation into these particular tires as well as the remaining Firestone tires under investigation. If the agency concludes that other tires should be recalled, it will act promptly to assure that the public is protected.

Attached: List of Tires Included in 9/1/00 Consumer Advisory

TIRES INCLUDED IN THE SEPTEMBER 1, 2000 CONSUMER ADVISORY

Tire Line	Size	Plant Code	Original Installation
ATX	P205/75R15	VD	1991 Chevy Blazer
ATX	P225/75R15	HY	
ATX	30X9.50R15LT	VD	
ATX	31X10.50R15LT	VD	1991-94 Nissan Pick Up
ATX	32X11.50R15LT	VD	
ATX	31X10.50R16.5LT	VD	
ATX	33X12.50R16.5LT	VD	
Firehawk ATX	27X8.50R14LT	VD	
Firehawk ATX	235/75R15*	VD	
Firehawk ATX	30X9.50R15LT	VD	
Firehawk ATX	31X10.50R15LT	VD	
Firehawk ATX	32X11.50R15LT	VD	
Firehawk ATX	33X12.50R15LT	VD	
Firehawk ATX	265/75R16LT	VD	
Firehawk ATX	255/85R16LT	VD	
Firehawk ATX	31X10.50R16.5LT	VD	
Firehawk ATX	33X12.50R16.5LT	VD	
ATX 23 Degree	31X10.50R15LT	VD	
ATX 23 Degree	33X12.50R16.5LT	VD	
Widetrack Radial Baja	P225/75R15	HY	
Widetrack Radial Baja A/S	32X11.50R15LT	VD	
Wilderness AT	P235/70R16	W2	1996-98 Ford F150
Wilderness AT	33X12.50R16.5LT	VD	
Wilderness HT	P255/70R15	VD	

* Firestone's lists this model as a LTP235/75R15.

The majority of the tires listed above were sold as replacements in the aftermarket mostly for light trucks and SUV In the right column are vehicles upon which the tires were originally installed by the vehicle manufacturer when new

How do I know if my tires are included ?
A. First you need to read the model name off of the sidewall of your tire and verify that it's on the above list. Onc you establish that you have one of the models listed above, you need to check the tire size and verify it's on the list The tire size is located on both sides of the tire in raised letters. The tire size should be one of the sizes listed above

B. Next you need to locate the DOT code to determine where your tire was built (plant). The DOT number is located on the blackwall side of the tire, under the F in Firestone and it is 10 characters long, and it starts with DOT Since this code is on the blackwall side of the tire, and not on the outside of the tire, you may need to crawl underneath your vehicle with a flashlight to find the code. There may be spaces in between some of the numbers, bu be sure to count all 10 characters to ensure you have found the proper code. Examples include:

DOT VDHL1PM046
DOT W2HL1M0470
DOT VDHLA16089

The first two letters of the DOT code are the DOT plant code (see right hand column above) If the first tow letters of the DOT code are VD, HY, or W2 and you have the tire line and size shown above, then your tires are on the consumer advisory list.

U.S. Department of Transportation
Office of Public Affairs
Washington, D.C.
www.dot.gov/briefing.htm
News

FOR IMMEDIATE RELEASE
Friday, September 1, 2000

NHTSA
Contact: Rae Tyson
Telephone: 202-366-9550

Media Advisory
NHTSA Administrator Issues Consumer Advisory

Dr. Sue Bailey, Administrator, National Highway Traffic Safety Administration, today issued the attached Consumer Advisory concerning an additional 1.4 million tires that were not included in the Firestone Tire Company's initial August 9, 2000 recall of 47 million ATX, ATX II, and Wilderness tires.

ODI Fatal Crash Summary

VEHICLE	Incidents	Fatalities	Rollovers	May be rollovers, but not specified on report
Explorer	57	71	53	4
Bronco II	1	1	1	0
Blazer	2	2	2	0
Unknown	3	3	3	0
TOTAL	63	77	59	4

TIRE
MAINTENANCE
WARRANTY
AND
SAFETY
MANUAL

Firestone

"LIMITED WARRANTY" Firestone Brand Passenger and Light Truck Tires

TIRES AND USES COVERED

This warranty covers all new Firestone brand passenger tires including radial passenger tires with Self Seal, the TEMPA SPARE, the LIMITED SERVICE SPARE, and the new Firestone brand truck tires as listed in our "Light Truck Tire and Tube Price List." Tires branded "Blem" are not warranted for ride or appearance. Tires marked "NA" or "NO ADJ" are not warranted.

WHO GETS THE WARRANTY, WHAT IS WARRANTED AND FOR HOW LONG?

If, before wearing down to 2/32nds of an inch of tread depth remaining (i.e., worn down to the top of the built-in indicators in the tread grooves), any tire covered by this warranty becomes unusable for any reason within the manufacturer's control, such tire will be replaced with an equivalent new Firestone tire on the basis set forth below. Some examples of causes or conditions normally beyond the manufacturer's control are:

1. Road hazards, (for example: puncture, cut, snag, stone drill, impact or bruise break) or damage from curbing or wheel spinning;
2. Apparent overload or improper inflation pressure;
3. Wheel misalignment, tire/wheel assembly imbalance, or other vehicle conditions, defects, or characteristics;
4. Mounting damage, racing, or other abuse;
5. Improper repair or improper insertion of sealant, balancing, or filler materials;
6. Intentional alteration of either the appearance or the physical characteristics of the tire;
7. Conditions caused by aging or improper storage; and
8. Failure to observe any of the safety and maintenance precautions contained in this manual.

This warranty is in addition to and/or may be limited by any other applicable written warranty covering special tires or situations you may have received.

REPLACEMENT PRICE

Radial passenger and light truck tires adjusted under this warranty will be replaced free of charge during the first 25% of treadwear or within the first 12 months after purchase (Proof of Purchase and Purchase Date are required) whichever is to owner-user's advantage.

Non radial passenger and light truck tires adjusted under this warranty will be replaced free of charge during the first 10% of treadwear.

During the free replacement period, mounting and balancing of passenger tires only are included.

After the free replacement period, to determine the replacement price, the percent of used treadwear is multiplied by the owner-user's regular buying price. Taxes, mounting, balancing, or other service charges will be added to the adjustment replacement price.

IN CANADA, the tire will be adjusted at dealerships (subject always to dealer discretion) at a predetermined "Adjustment Price"

REPLACEMENT WARRANTY. If you receive a tire under this warranty, it will be covered by the warranty Firestone then gives on that tire.

WHERE TO GO. See your Firestone retailer listed in the Yellow Pages under Tire Dealers — Retail.

CONSUMER RIGHTS. This warranty gives you specific legal rights, and you may also have other rights which vary from state to state and in Canada from province to province.

CONDITIONS AND EXCLUSIONS

TO THE EXTENT PERMITTED BY LAW, FIRESTONE DISCLAIMS LIABILITY FOR ANY CONSEQUENTIAL DAMAGES, LOSS OF TIME OR LOSS OF VEHICLE USE, OR INCONVENIENCE.

Some states do not allow the exclusion or limitation of incidental or consequential damages, so the above limitation or exclusion may not apply to you.

This warranty applies only to consumers actually using the tire and adjustments made in the United States or Canada.

Firestone's obligations under this policy may not be enlarged or altered by anyone.

IMPORTANT: In accordance with Federal Law, this warranty has been designated as a "Limited Warranty." Nothing in this warranty is intended to be a representation by Firestone that tire failures cannot occur.

OWNER-USER'S OBLIGATION

It is the owner-user's obligation to operate tires within tire load and specification limits and at cool air pressures specified by your vehicle manufacturer for load and speed according to individual tire size, type and load capacity. It is also the owner-user's obligation to maintain proper alignment of wheels, and to maintain proper tire/wheel assembly balance.

In case of adjustment claim, owner-user must present the tire to a Firestone retailer, complete and sign the customer section of the Firestone adjustment claim form, and pay appropriate replacement price, taxes and service charges.

We strongly recommend that you have your Firestone retailer inspect tires any time you notice irregular or uneven treadwear, or every 6,000 to 8,000 miles. This service is free.

Given in U.S.A. by:
Firestone Tire
Division of Bridgestone/
Firestone, Inc.
1200 Firestone Parkway
Akron, Ohio 44317

and

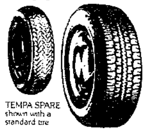
Given in Canada by:
Bridgestone/Firestone
Canada, Inc.
5770 Hurontario St.
Suite 400
Mississauga, Ontario L5R 3G5

THE FIRESTONE TEMPA SPARE™

...a revolutionary space-saving spare tire

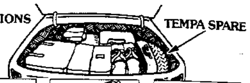
- Fully inflated and mounted on its own wheel...always ready for use.
- About half the size of a conventional spare...provides more usable storage space in your trunk.
- Weighs less than a regular tire, so it's easier to handle.

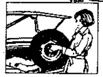
TEMPA SPARE™ is a special tire designed to let you finish a trip and obtain a replacement tire, if needed, at your convenience.


TEMPA SPARE shown with a standard tire

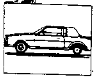
The TEMPA SPARE is smaller and thinner than a regular tire, which means you have more space in your trunk for luggage, golf clubs, children's equipment, etc. Check your inflation pressure.

INSTRUCTIONS FOR USE




Remove TEMPA SPARE from trunk. Check inflation pressure every 30 days and adjust to 60 psi

Replace flat tire with TEMPA SPARE

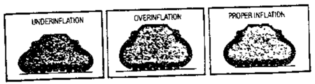

Your car is now ready for temporary use

IMPORTANT SAFETY INFORMATION

Any tire, no matter how well constructed, may fail in use as a result of punctures, impact damage, improper inflation, overloading, or other conditions resulting from use or misuse. Tire failure may create a risk of serious personal injury or property damage. To reduce the risk of tire failure, we strongly recommend you read and follow all safety information contained in this manual.

TIRE INFLATION

Always keep the recommended air pressure in all your tires, including the spare. This is an important requirement for tire safety and mileage. **Your vehicle tire placard or owner's manual will tell you the recommended air pressure.** On some vehicles, the recommended front and rear tire pressures will be different. Your Firestone retailer will be happy to point this out to you.



SAFETY WARNING: Driving on tires with too little air pressure is dangerous. Your tires will get over-heated. This can cause a sudden tire failure that could lead to serious personal injury.

Underinflation may also:
1. damage the tire leading to tire failure.
2. adversely affect vehicle handling.
3. reduce tire life.
4. increase fuel consumption.

SAFETY WARNING: Driving on tires with too much air can be dangerous. The tires are more likely to be cut, punctured, or broken by sudden impact. On some vehicles, handling characteristics can be seriously affected. Serious personal injury could result. Consult your vehicle tire placard for the recommended inflation and your owner's manual for other tire information.

SAFETY WARNING: Never inflate a tire unless it is secured to the vehicle or a tire mounting machine. Inflating an unsecured tire is dangerous. If it bursts, it could be hurled into the air with explosive forces resulting in serious personal injury.

TIPS FOR SAFE TIRE INFLATION

- Check your tire air pressure, including your spare tire, at least once a month and before long trips. Be sure to use an accurate pressure gauge.
- Check your air pressure when the tires are "cold." The tires are "cold" when your vehicle has been driven less than a mile at moderate speed after being stopped for three or more hours.
- If you must add air when your tires are hot, add four pounds per square inch (psi) (28 kPa) above the recommended cold air pressure. Recheck the inflation pressure when the tire is cold.
- Never release air from a hot tire in order to reach the recommended cold tire pressure. Normal driving causes tires to run hotter and air pressure to increase. If you release air when your tires are hot, you may dangerously under-inflate your tires.
- If your tires lose more than two pounds per square inch (psi) (14 kPa) per month, the tire, the valve, or wheel may be damaged. Consult your local Firestone store or tire dealer for a free inspection.
- Check your spare tire also. Consult your vehicle owner's manual for the correct inflation and use of a "temporary use" spare tire.

OVERLOADING

SAFETY WARNING: Driving your vehicle in an overloaded condition is dangerous. Overloading causes excessive heat to build up in your tires. This can lead to sudden tire failure and serious personal injury while the tire is overloaded or at some later date.

TIPS FOR SAFE LOADING

Consult your vehicle tire placard and owner's manual for the vehicle load limits, proper tire inflation, and special trailer towing instructions that apply to your vehicle and tires.

- Never exceed the maximum load rating stamped on the sidewall of your tire or the maximum vehicle load rating, whichever is less. The maximum vehicle load rating (GVWR) is found on the certification label on the driver's door.

TIRE DAMAGE

SAFETY WARNING: Driving on damaged tires is dangerous. A damaged tire can suddenly fail causing serious personal injury. Have your tires regularly inspected by your Firestone retailer for damage.

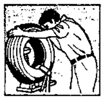
TIPS FOR SPOTTING DAMAGED TIRES

- After striking anything unusual in the roadway, ask your Firestone retailer to demount the tire and inspect it for damage. A tire may not have visible signs of damage on the tire surface. Yet, the tire may suddenly fail without warning, a day, a week, or even months later.
- Inspect your tires for cuts, cracks, splits, or bruises in the tread and sidewall areas. Bumps or bulges may indicate a separation within the tire body. Have your tire inspected by a qualified tire service person. It may be necessary to have it removed from the wheel for a complete inspection.
- Inspect your tires for uneven wear. Wear on one side of the tread or flat spots in the tread may indicate a problem with the tire or vehicle. Consult your Firestone retailer.
- Inspect your tires for adequate tread depth. When the tire is worn to the built-in indicators (2/32 inch, 1.6 millimeters, or less tread groove depth) or the tire cord or fabric is exposed, the tire is dangerously worn and must be replaced immediately.
- Inspect your tire rims also. If you have a bent or cracked rim, it must be replaced.

TIRE REPAIRS

SAFETY WARNING: Driving on an improperly repaired tire is dangerous. The repair can cause further damage to the tire. It may suddenly fail, causing serious personal injury. To be safe, go to your Firestone retailer for proper tire repairs.

- Never repair a tire with less than 2/32 inch (1.6 millimeters) tread remaining. At this tread depth, the tire is worn out and must be replaced.
- Never repair a tire with a puncture larger than 1/4 inch (6.4 millimeters) in diameter. Such tires cannot be properly repaired and must be replaced.
- Repairs of all tires (radial and non-radial) must be of the plug and inside patch type unless the hole is too small to insert a plug. Using plugs alone on any type of tire is not a safe repair.
- Never repair a tire with a puncture or other damage outside the tread area. Such tires cannot be properly repaired and must be replaced.



- Any tire repair done without removing the tire from the rim is improper.
- Tubes, like tires, should be repaired only by a qualified tire service person.
- Never use a tube as a substitute for a proper repair.

REMOVING AND REPLACING TIRES ON RIMS (TIRE MOUNTING)

SAFETY WARNING: Always stand well clear of any tire mounting operation. This is especially important when the service operator inflates the tire. If the tire has been improperly mounted, it may burst with explosive force causing serious personal injury.

A new valve must be installed in the rim each time a worn out passenger tire is replaced.

SAFETY WARNING: Removing and replacing tires on rims can be dangerous. Attempting to mount tires with improper tools or procedures may result in a tire explosion causing serious personal injury. This is a job for your Firestone retailer or qualified tire mechanic only.

Personal injury can result from:

1. Failure to select the proper tire and rim.

   The tire must match the width and diameter requirements of the rim. For example, when mounting 16-inch diameter tires, use only 16-inch diameter rims. When mounting truck type radial tires, use only wheels approved for radial tires.

2. Failure to inspect both the tire and rim.

   The rim must be free of cracks, dents, chips, and rust. The tire must be free of bead damage, cuts, and punctures.

3. Failure to follow proper procedures.

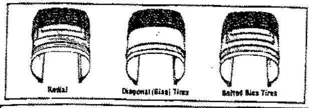
   For proper mounting procedures, consult the **Care and Service of Automobile Tires** or the **Care and Service of Highway Truck Tires** published by the Rubber Manufacturer's Association.

4. Exceeding the maximum bead seating pressure.

   The service mechanic must never inflate a tire beyond 40 pounds per square inch (psi) (276 kPa) to seat the beads. Be absolutely certain beads are fully seated before adjusting inflation pressure to the level recommended for vehicle operation.

TIRE MIXING

SAFETY WARNING: Driving your vehicle with an improper mix of tires is dangerous. Your car's handling characteristics can be seriously affected. You could have an accident resulting in serious injury. Consult your vehicle owner's manual or Firestone retailer for the proper tire replacement.



TEMPORARY-USE SPARE TIRES

Your car may be equipped with a "temporary use" spare tire. This spare may differ in size and construction from the other tires on your vehicle.

SAFETY WARNING: Check inflation pressure before use. See Tire Inflation Section in this manual.

SAFETY WARNING: Placing (mounting) your temporary use tire on a wheel which is not specifically designed for use with the temporary use tire or placing another type tire on your temporary use wheel can be dangerous. Your vehicle's handling characteristics can be seriously affected. You could have an accident resulting in serious personal injury. Consult your vehicle owner's manual for proper use of your "temporary use" spare tires.

HIGH SPEED

SAFETY WARNING: Driving at high speed is dangerous, and can cause a vehicle accident, including serious personal injury or death.

1. Regardless of the speed and handling capabilities of your car and its tires, a loss of vehicle control can result from exceeding the maximum speed (a) allowed by law or (b) warranted by traffic, weather, vehicle, or road conditions. High-speed driving should be left to trained professionals operating under controlled conditions.
2. No tire, regardless of its design or speed rating, has unlimited capacity for speed, and a sudden tire failure can occur if its limits are exceeded.
   (a) Non-speed-rated tires are built for ordinary passenger service, and should never be used for high-speed driving.
   (b) Even "speed-rated" tires may not be safely driven at speeds exceeding their maximum actual speed capability. The following information should help you understand the tire speed rating system and use speed-rated tires safely.

3. LT (Light Truck) Designated Tires Only:
It is not recommended that your truck be operated at speeds in excess of legal limits. However, if it is anticipated that sustained driving at speeds in excess of 65 MPH may be required, then:
(a) At speeds from 66 MPH through 75 MPH (106 KM/H through 121 KM/H), cold inflation pressures must be increased 10 PSI (70 KPA) above the recommended pressures for the load being carried. Do not exceed the maximum inflation pressure of the wheel. Sustained speeds from 66 MPH through 75 MPH are not permitted when the 10 PSI increase would exceed the wheel's maximum inflation pressure.
(b) For sustained driving at speeds from 76 MPH through 85 MPH (122 KM/H through 137 KM/H), reduce axle load capacity by 10% in addition to increasing the inflation pressure as listed in (A) above.

NOTE: LT tires should not be operated at speeds in excess of 85 MPH (137 KM/H).

TIRE SPEED RATINGS

Some tires, especially "performance" tires, bear a letter "speed rating" designation indicating the tire's design speed capability. This speed rating system is intended to allow you to compare the speed capabilities of tires.

When purchasing or replacing speed-rated tires, make sure to:
(a) use the rankings in the chart below to compare the speed ratings of all the tires, and
(b) follow the vehicle manufacturer's recommendations, if any, concerning the use of speed-rated tires.

To avoid reducing the speed capability of the vehicle, replace a speed-rated tire only with another tire having at least the same speed rating. Remember, it's the "top speed" of the "slowest" tire on the car which cannot be exceeded without risk of tire failure.

The letter symbols and corresponding design speeds are as follows:

Speed-Rating Symbol	Speed Category
S	Up to 112 mph (180 km/h)
T	Up to 118 mph (190 km/h)
H	Up to 130 mph (210 km/h)
V (with service description)	Up to 149 mph (240 km/h)
V (no service description)	Over 130 mph (210 km/h)*
Z	Over 149 mph (240 km/h)*

*Although no upper-limit speeds are specified here, the indicated tires nonetheless have limited rated speed capabilities. For more detailed technical information, call Firestone at 1-800-356-4644.

These speed ratings are based on laboratory tests under specific, controlled conditions. While these tests relate to performance on the road under those conditions, remember that real-life driving is rarely identical to any test conditions. Your tire's actual speed capability may be less than its rated speed, since it is affected by factors such as inflation pressure, load, prior alteration or damage, driving conditions, alignment, wear, vehicle condition, and the duration for which high speed is sustained.

A tire's speed rating becomes void if the tire is repaired, retreaded, damaged or abused, or otherwise altered from its original condition. Thereafter, it should be treated as a non-speed-rated tire.

The tire's speed rating designation appears on the tire sidewall with the tire size. Examples:

P215/65R15 88H   P205/60TR15 90T   185/70SR13

In these examples, the "H," "T," and "S" respectively, are the speed ratings ("R" indicates that each of the example tire sizes are radials). The "88H" and "90T" in the first two examples are called "service descriptions."

TIRE SPINNING

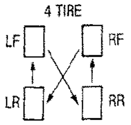
SAFETY WARNING: Spinning a tire to remove a vehicle stuck in mud, ice, snow, or wet grass can be dangerous. A tire spinning at a speedometer reading above 35 miles per hour (55 km/h) can in a matter of seconds reach a speed capable of disintegrating a tire with explosive force. Under some conditions, a tire may be spinning at a speed twice that shown on the speedometer. This could cause severe injury to a bystander or passenger and extensive vehicle damage. Never spin tires above a speedometer reading of 35 mph (55 km/h).

SAFETY WARNING: Spin balancing a tire at speeds exceeding a vehicle speedometer reading of 35 mph (55 km/h) [70 mph (115 km/h) if the tire is being balanced off of the vehicle or if your vehicle is equipped with a limited slip differential] can be dangerous. The tire may fail with explosive force causing serious personal injury. Only trained personnel should spin balance tires. You should stand well away from the work area when tires are being spin balanced.

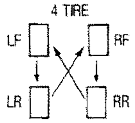
RADIAL TIRE ROTATION PASSENGER CAR TIRES

The purpose of tire rotation is to minimize irregular or uneven wear caused by maintaining a tire in one rotation direction and one position over an extended period. The following rotation patterns are normally recommended for radial passenger tires:

REAR WHEEL DRIVE



FRONT WHEEL DRIVE



Some exceptions to these patterns may exist. See your owner's manual for recommended pattern.

Follow the vehicle manufacturer's recommendations for the mileage interval for tire rotation. If the vehicle manufacturer's recommendations cannot be found, tires should be rotated every 6,000 to 8,000 miles. Individual tire pressures must be checked after rotation and adjusted to the vehicle manufacturer's recommendation for the new location on the vehicle. Vehicle alignment should be checked if irregular wear is evident.

TIRE STORAGE

Tires should be stored indoors in a cool dry place where water cannot collect inside the tires. The tires should be placed away from electric generators and motors and sources of heat such as hot pipes. Storage surfaces should be clean and free of grease, gasoline, or other substances which can deteriorate the rubber. Improper storage can damage your tires in ways that may not be visible and can lead to serious personal injury.

TIRE SERVICE/ CUSTOMER SATISFACTION

Normal tire maintenance and warranty services are available at Firestone retailers across the U.S.A. and Canada. For more information, please call our Customer Relations Department (1-800-356-4644). In Canada (1-416-890-1990).

Additional information on the care and service of automobile tires is available by writing to the:

Rubber Manufacturer's Association
1400 K St., N.W.
Washington, DC 20005
or
Rubber Association of Canada
89 Queensway West, Suite 308
Mississauga, Ontario L5B 2V2

TIRE REGISTRATION

Registration of your tires is an important safety precaution since it allows the manufacturer to notify you in the event of a recall. When you purchase replacement tires at a store owned by a tire manufacturer (e.g., Firestone) or tire brand name owner, the retailer will register the tires for you. When you purchase tires at an independent tire dealer, however, you will be provided with a registration card on which the tire serial numbers have been recorded. Be sure to fill in your name and address on this card and mail it promptly.

You need not register tires which come as original equipment on new vehicles, as the vehicle and tire manufacturers handle that for you.

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TOPICS

- 1999 VS 1998 YEAR END ADJUSTMENTS
  - FIRESTONE PASSENGER
    - BY SERVICE GROUP
    - BY PATTERN
  - FIRESTONE LIGHT TRUCK - RECREATIONAL
    - BY SERVICE GROUP
    - BY PATTERN
- RELATED ISSUES
  - NEW ADVERTISING PROGRAM
  - NEW FIRESTONE DATABOOK
  - NEW PRODUCT INTRODUCTION

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END
FIRESTONE LT TRUCK - REC - BY SERVICE GROUP

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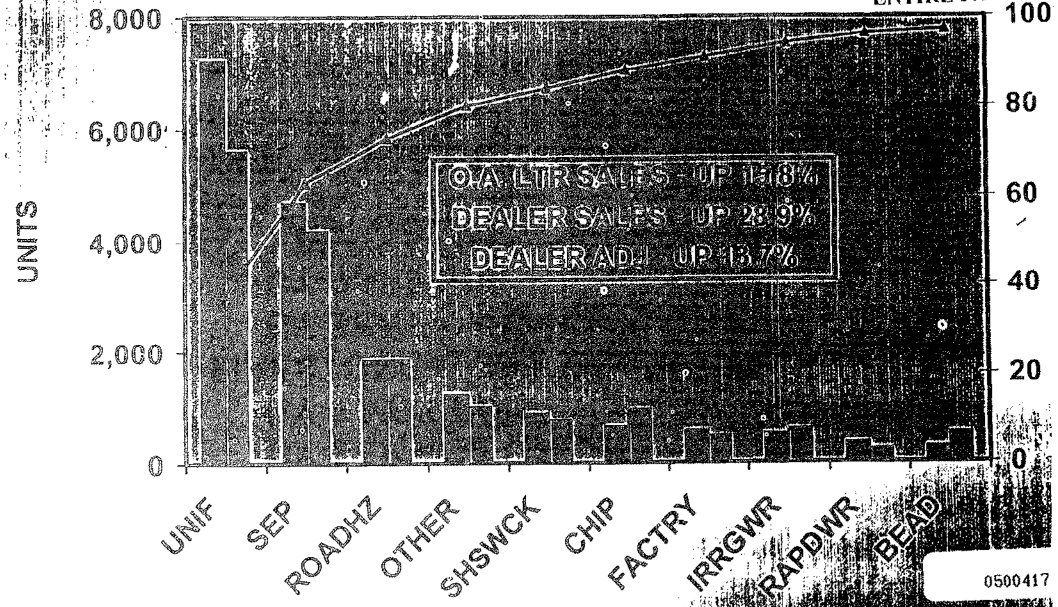

CURRENT 18848 $1,024,192
PREVIOUS 16574 $829,793

NO STORE OR SALE ADJUSTMENTS

UNIFORMITY TOO HIGH

OOR - UP 24.6%
HARSH RIDE - UP 58.8%
CONICITY - UP 44.1%

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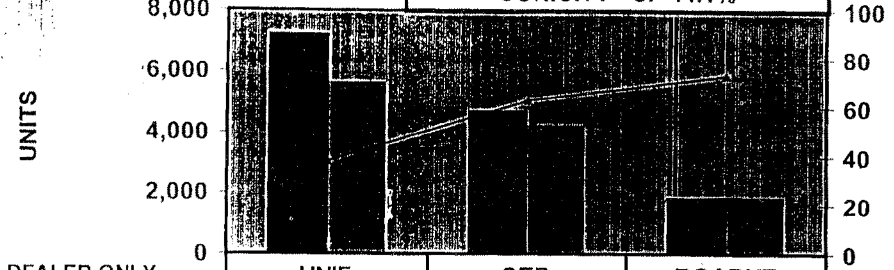

DEALER ONLY

	UNIF	SEP	ROADHZ
▬ CURRENT	7221	4694	1846
▬ PREVIOUS	5607	4200	1846
%CHG	28.8	11.8	0
CURR $/ADJ	$78.02	$37.72	$25.59
PREV $/ADJ	$68.98	$38.08	$29.02
—▲— % OF TOTAL	38	63	73

SEPARATIONS INCREASING

BELT EDGE SEP - UP 14.7%
BELT LEAVE BELT - DOWN 1.7%
SW SEP - RUBBER FROM CASING- UP 58.1%

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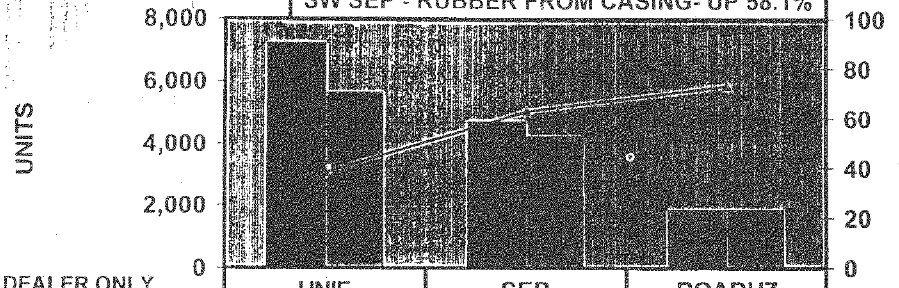

DEALER ONLY

	UNIF	SEP	ROADHZ
■ CURRENT	7221	4694	1846
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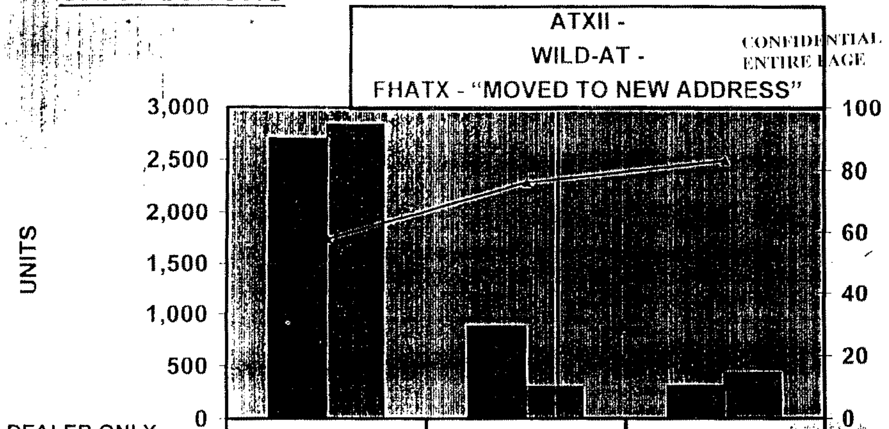
SEPARATIONS



CONFIDENTIAL
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DEALER ONLY

	ATXII	WILD-AT	FHATX
■ CURRENT	2702	885	313
▨ PREVIOUS	2832	301	438
%CHG	-4.6	194	-28.5
—▲— % OF TOTAL	58	76	83

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END

FIRESTONE LT TRUCK - REC - BY PATTERN -

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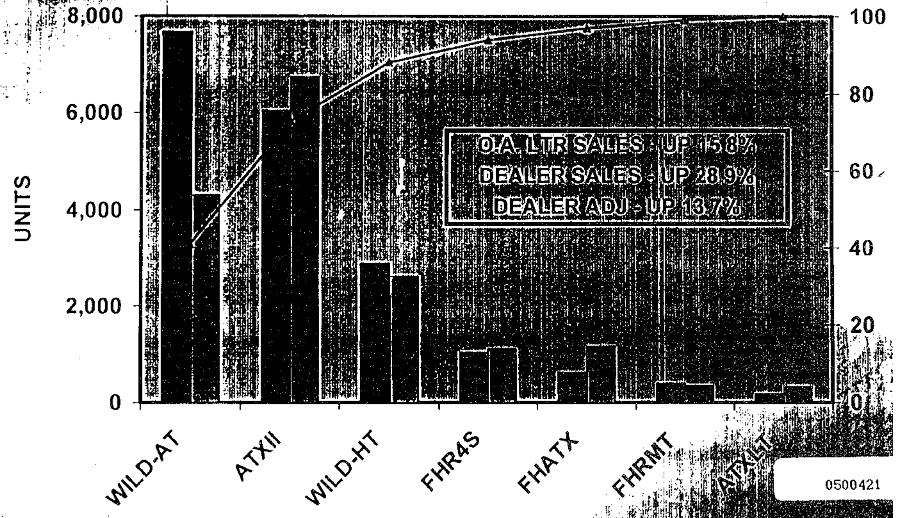

NO STORE OR SALE ADJUSTMENTS

CURRENT 18848 $1,024,192
PREVIOUS 16574 $829,793

WILD-AT ADJUST.
GROWING QUICKLY

UNIF - UP 95.7% - O.O.R.
RH - UP 35.9% - SW PUNCT & TRD PUNCT
SEP - UP - BELT EDGE SEP

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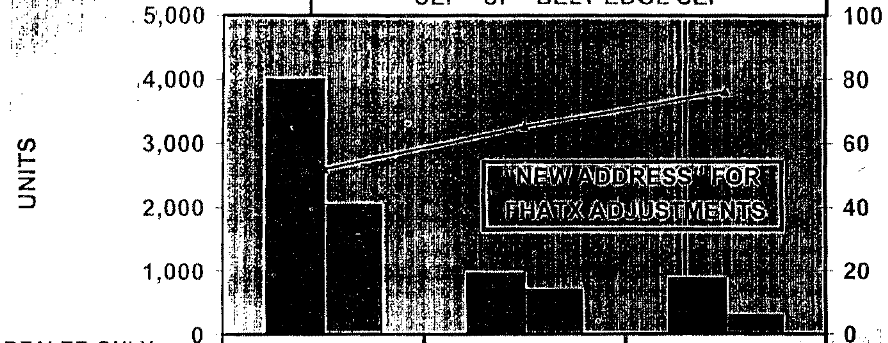

DEALER ONLY

	UNIF	ROADHZ	SEP
■ CURRENT	4008	957	885
■ PREVIOUS	2048	704	301
%CHG	95.7	35.9	194
—+— % OF TOTAL	52	65	76

RAD ATXII
MOVING DOWN

SEP - DOWN 4.6% - BELT EDGE SEP
UNIF - DOWN 11.9% - O.O.R.
SHSWCRK - DOWN 9.4% - WSW CIRCUMF CRK

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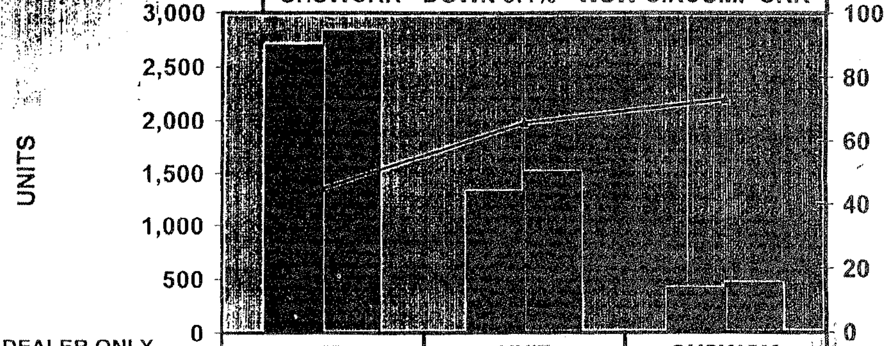

DEALER ONLY

	SEP	UNIF	SHSWCK
■ CURRENT	2702	1325	413
▨ PREVIOUS	2832	1504	456
%CHG	-4.6	-11.9	-9.4
—+— % OF TOTAL	45	66	73

WILD-HT ADJUST.

ALSO GROWING

UNIF - UP 19.2% - O.O.R.
RH - DOWN 10.8% - TRD PUNCT & RUNFLAT
SEP - UP - BELT EDGE SEP

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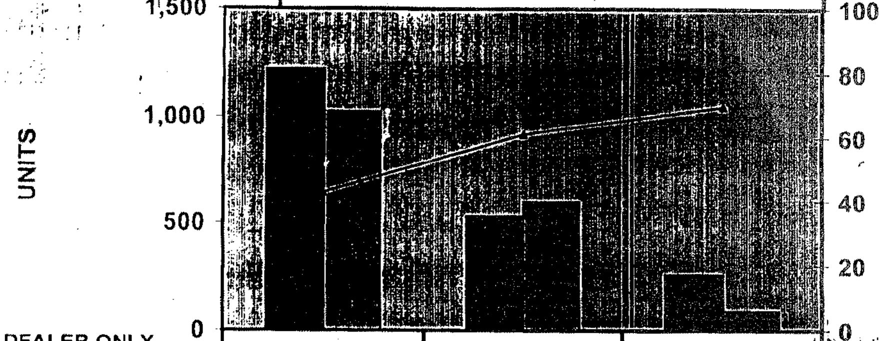
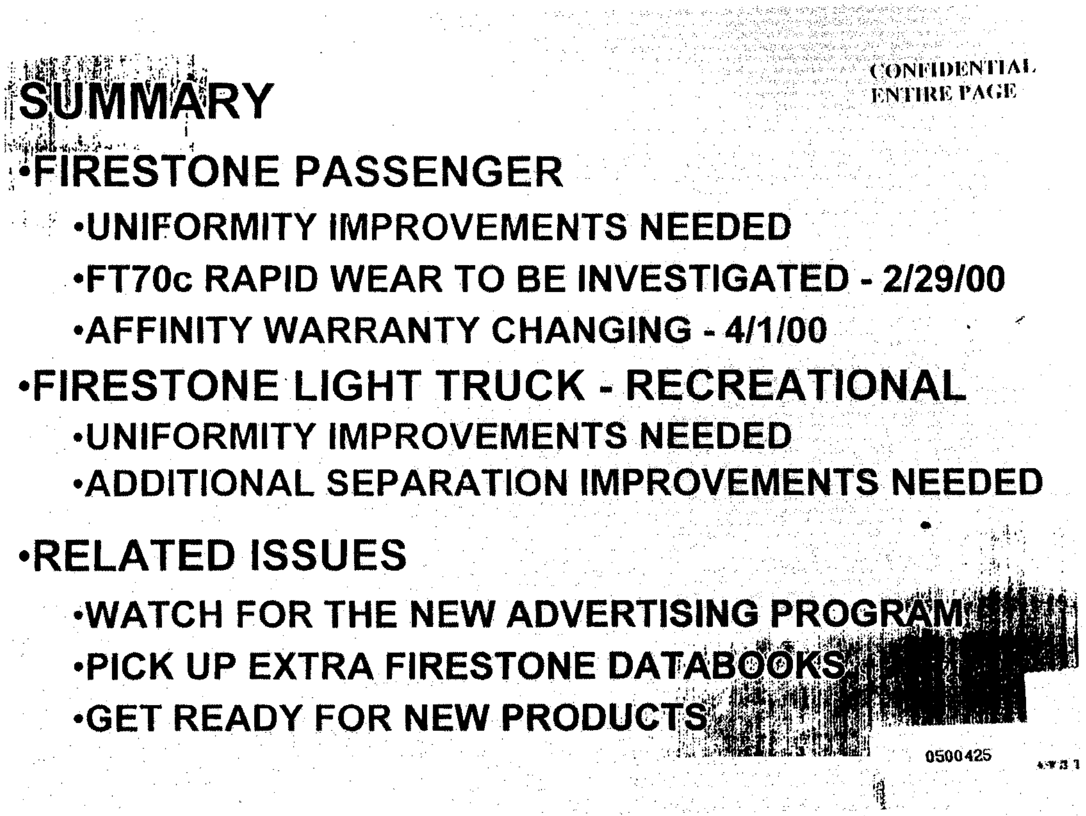


DEALER ONLY

	UNIF	ROADHZ	SEP
■ CURRENT	1224	536	263
■ PREVIOUS	1027	601	91
%CHG	19.2	-10.8	189
—▲— % OF TOTAL	43	61	70



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SUMMARY

- FIRESTONE PASSENGER
  - UNIFORMITY IMPROVEMENTS NEEDED
  - FT70c RAPID WEAR TO BE INVESTIGATED - 2/29/00
  - AFFINITY WARRANTY CHANGING - 4/1/00
- FIRESTONE LIGHT TRUCK - RECREATIONAL
  - UNIFORMITY IMPROVEMENTS NEEDED
  - ADDITIONAL SEPARATION IMPROVEMENTS NEEDED
- RELATED ISSUES
  - WATCH FOR THE NEW ADVERTISING PROGRAM
  - PICK UP EXTRA FIRESTONE DATABOOKS
  - GET READY FOR NEW PRODUCTS

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DEALER VS. AMTS - 1999 YEAR END
FIRESTONE LIGHT TRUCK - RECREATIONAL
- BY SERVICE GROUP -

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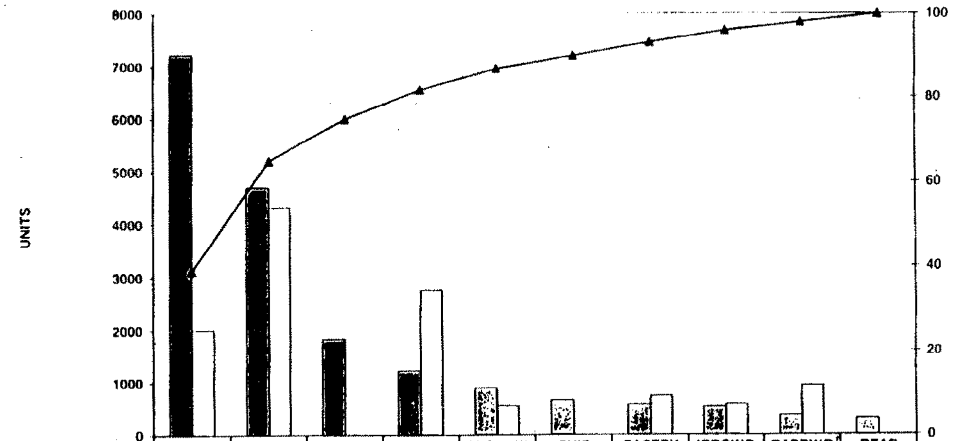

	UNIF	SEP	ROADHZ	OTHER	SHSWCK	CHIP	FACTRY	IRRGWR	RAPDWR	BEAD
▬ DEALER	7221	4694	1846	1230	898	655	573	535	358	298
▭ AMTS	1991	4326	0	2746	543	0	731	564	934	0
%DIFF	262.7%	8.5%		-55.2%	65.4%		-21.6%	-5.1%	-61.7%	
DLR $/ADJ	$78.02	$37.72	$25.59	$56.49	$40.17	$41.29	$65.59	$32.41	$25.60	$39.19
AMTS $/ADJ	$51.35	$40.40	$0.00	$47.38	$44.45	$0.00	$52.43	$44.00	$34.73	$0.00
—▲— DLR % OF TOT	39	65	75	82	87	90	93	96	98	100

DEALER	18848	$1,024,192
AMTS	12507	$582,305

B1A1

DEALER VS. AMTS - 1999 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL
- UNIFORMITY - BY PATTERN -

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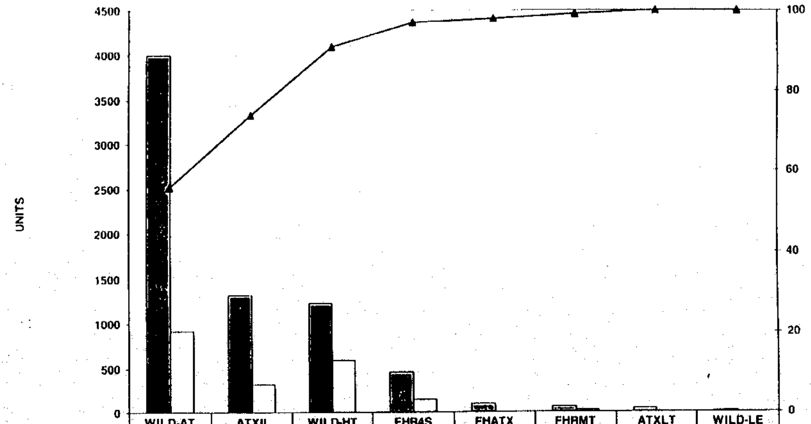

	WILD-AT	ATXII	WILD-HT	FHR4S	FHATX	FHRMT	ATXLT	WILD-LE
▇ DEALER	4008	1325	1224	458	92	62	44	8
☐ AMTS	919	318	584	143	3	24	0	0
%DIFF	336.10%	316.70%	109.60%	220.30%		158.30%		
▲ DLR % OF TOT	56	74	91	97	98	99	100	100

DEALER	7,224
AMTS	1,991

B1A2

DEALER VS. AMTS - 1999 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL
- UNIFORMITY - BY PRIM SERV COND -

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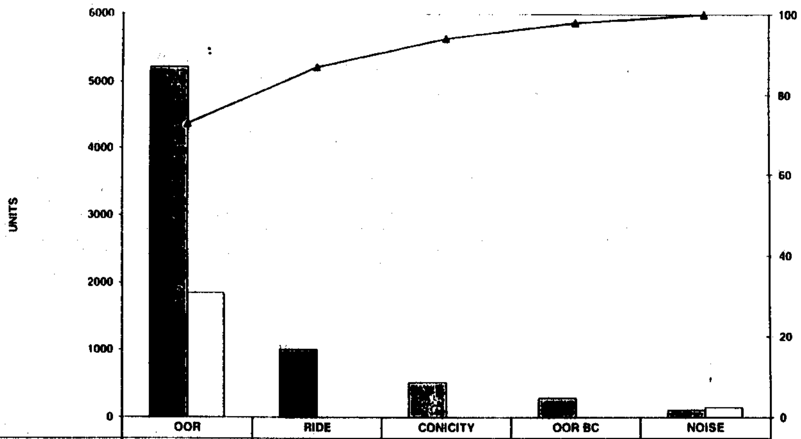

	OOR	RIDE	CONICITY	OOR BC	NOISE
▬ DEALER	5209	998	523	288	115
▭ AMTS	1842				149
%DIFF	182.8%				-22.8%
—▲— DLR % OF TOT	73	87	94	98	100

DEALER	7,224
AMTS	1,991

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DEALER VS. AMTS - 1999 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL

- SEPARATIONS - BY PATTERN -

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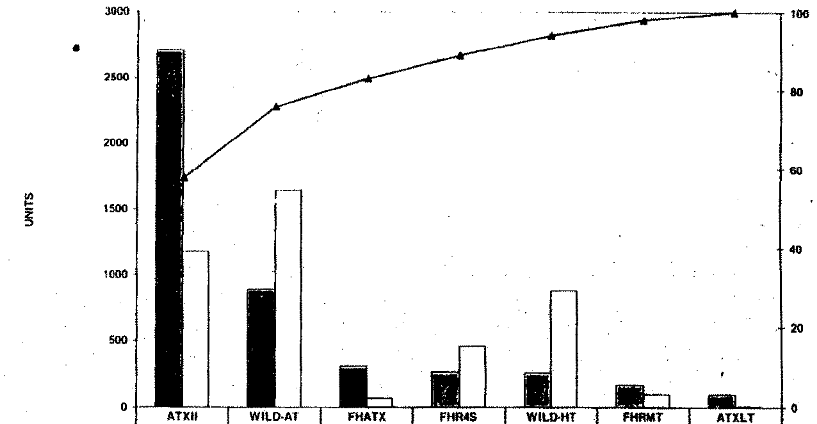

	ATXII	WILD-AT	FHATX	FHR4S	WILD-HT	FHRMT	ATXLT
■ DEALER	2702	885	311	270	263	162	99
□ AMTS	1178	1644	69	460	873	93	9
%DIFF	129.4%	-46.2%	353.6%	-41.3%	-69.9%	74.2%	
▲ DLR % OF TOT	58	76	83	89	94	98	100

DEALER	4,694
AMTS	4,326

B1C1

DEALER VS. AMTS - 1999 YEAR END
FIRESTONE LIGHT TRUCK - RECREATIONAL
- OTHER - BY PRIMSERV COND -

CONFIDENTIAL
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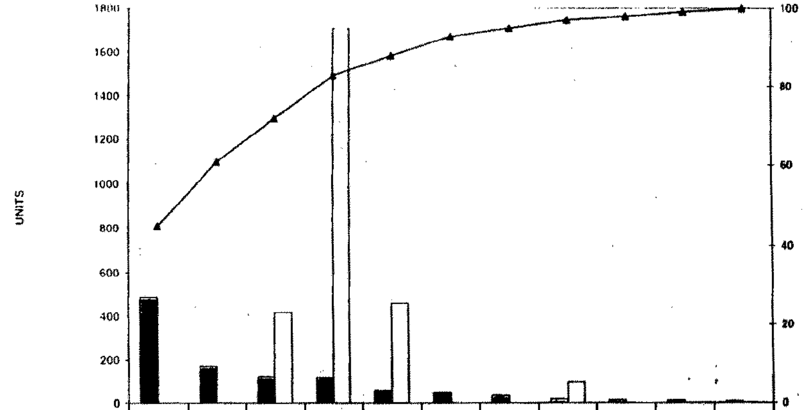

	TRANSIT	NOCOND	MISCOA	MISCTRD	MISCSW	30 DAY	SWAIR	MISCBD	MISCSH	DYNDMG	VEHDMG
▬ DEALER	488	171	121	117	58	50	31	15	13	12	10
▭ AMTS			418	1711	459			97			
%DIFF			-71.1%	-93.2%	-87.4%			-84.5%			
▲ DLR % OF TOT	45	61	72	83	88	93	95	97	98	99	100

DEALER 1,270
AMTS 2,746

B2

DEALER VS. AMTS - 1999 YEAR END
FIRESTONE LIGHT TRUCK - RECREATIONAL
- BY PATTERN -

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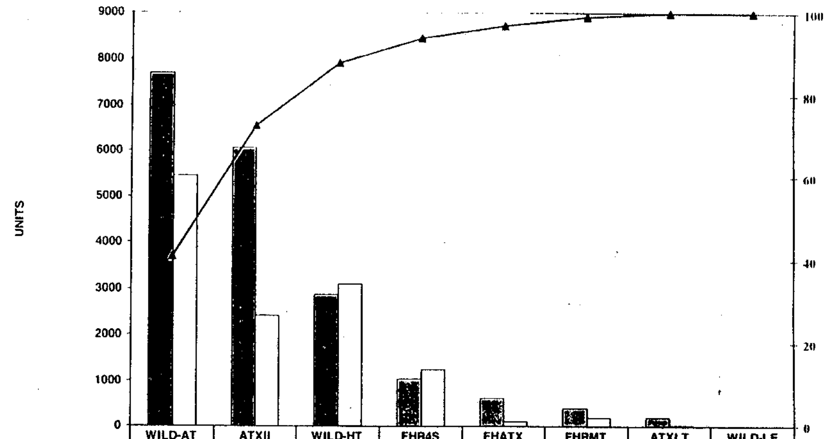

	WILD-AT	ATXII	WILD-HT	FHR4S	FHATX	FHRMT	ATXLT	WILD-LE
▬ DEALER	7692	6064	2877	1026	611	384	183	9
▭ AMTS	5459	2422	3090	1229	113	178	15	1
%DIFF	40.90%	150.40%	-6.90%	-16.50%	440.70%	115.70%		
─▲─ DLR % OF TOT	41	73	88	94	97	99	100	100

DEALER	18848	$1,024,192
AMTS	12507	$582,305

B3

UNITS - 1999 VS 1998 YEAR END
FIRESTONE LIGHT TRUCK - RECREATIONAL
- BY SERVICE GROUP -

CONFIDENTIAL
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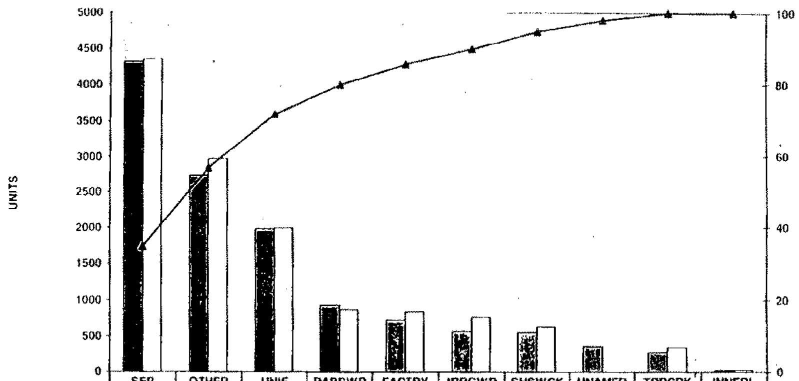

	SEP	OTHER	UNIF	RAPDWR	FACTRY	IRRGWR	SHSWCK	UNAMED	TRDCRK	INNERL
▬ CURRENT	4326	2746	1991	934	731	564	543	361	284	27
☐ PREVIOUS	4367	2978	2007	872	836	771	622	2	348	24
%CHG	-0.90%	-7.80%	-0.80%	7.10%	-12.60%	-26.80%	-12.70%		-18.40%	12.50%
CURR $/ADJ	$40.40	$47.38	$51.35	$34.73	$52.43	$44.01	$44.45	$117.45	$41.18	$50.83
PREV $/ADJ	$38.96	$47.33	$51.99	$37.77	$45.31	$48.06	$40.54	$47.52	$43.60	$45.05
—▲— % OF TOTAL	35	57	72	80	86	90	95	98	100	100

CURRENT	12507	$582,305
PREVIOUS	12827	$564,876

B3A2

AMTS - 1999 VS 1998 YEAR END
FIRESTONE LIGHT TRUCK - RECREATIONAL
- SEPARATIONS - BY PATTERN -

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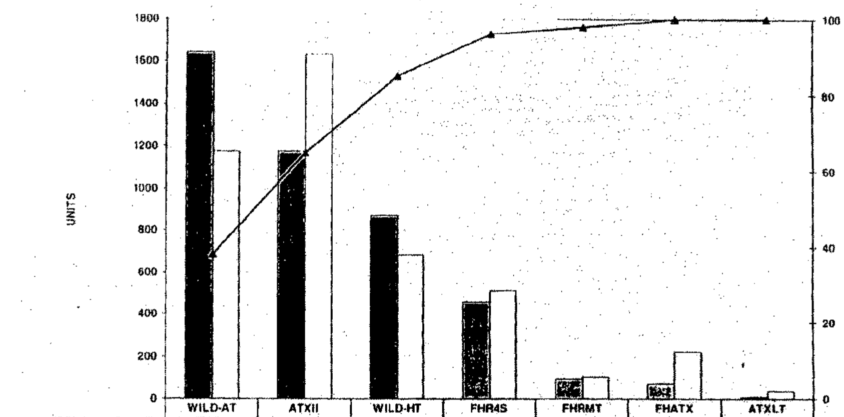


	WILD-AT	ATXII	WILD-HT	FHR4S	FHRMT	FHATX	ATXLT
▬ CURRENT	1644	1178	873	460	93	69	9
☐ PREVIOUS	1176	1636	680	512	104	223	36
%CHG	39.8%	-28.0%	28.4%	-10.2%	-10.6%	-69.1%	-75.0%
—▲— % OF TOTAL	38	65	85	96	98	100	100

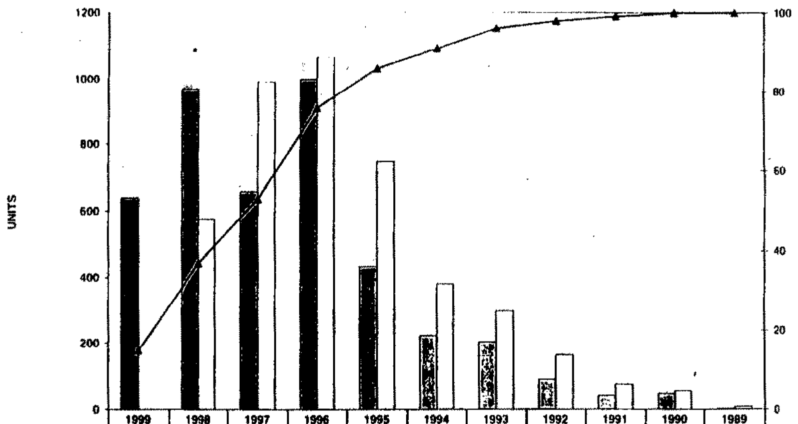
CURRENT 4,326
PREVIOUS 4,367

B3B1

AMTS - 1999 VS 1998 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL
- SEPARATIONS - BY DOT YEAR -

CONFIDENTIAL
ENTIRE PAGE



	1999	1998	1997	1996	1995	1994	1993	1992	1991	1990	1989
▬ CURRENT	638	969	657	1000	432	223	205	92	41	46	4
▭ PREVIOUS	1	575	990	1066	749	381	295	164	76	56	7
%CHG		68.5%	-33.6%	-6.2%	-42.3%	-41.5%	-30.7%	-43.9%	-46.1%	-17.9%	-42.9%
—▲— % OF TOTAL	15	37	53	76	86	91	96	98	99	100	100

CURRENT	4,326
PREVIOUS	4,367

B3C2

AMTS - 1999 VS 1998 YEAR END
FIRESTONE LIGHT TRUCK - RECREATIONAL
- SEPARATIONS - BY PLANT -

CONFIDENTIAL
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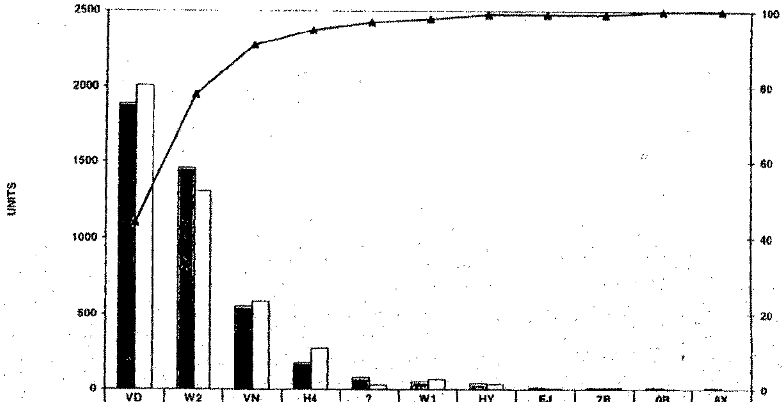

	VD	W2	VN	H4	?	W1	HY	EJ	7B	OB	8X
▬ CURRENT	1888	1464	553	177	80	51	38	13	12	11	11
▭ PREVIOUS	2006	1305	582	273	28	68	34	6	13	4	
%CHG	-5.90%	12.20%	-5.00%	-35.20%	185.70%	-25.00%	11.80%	116.70%	-7.70%	175.00%	
▲ % OF TOTAL	44	78	91	95	97	98	99	99	99	100	100

CURRENT	4,326
PREVIOUS	4,367

B4

AMTS - 1999 VS 1998 YEAR END
FIRESTONE LIGHT TRUCK - RECREATIONAL
- BY PATTERN -

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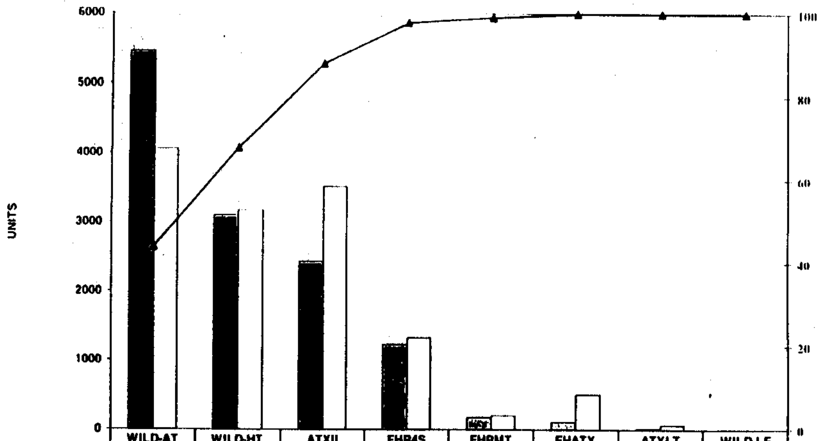

	WILD-AT	WILD-HT	ATXII	FHR4S	FHRMT	FHATX	ATXLT	WILD-LE
▬ CURRENT	5459	3090	2422	1229	178	113	15	1
▭ PREVIOUS	4057	3168	3510	1318	205	504	64	0
%CHG	34.60%	-2.50%	-31.00%	-6.80%	-13.20%	-77.60%	-76.60%	
—▲— % OF TOTAL	44	68	88	98	99	100	100	100

CURRENT - 4,868
PREVIOUS 5,103

B4A2

AMTS - 1999 VS 1998 YEAR END
FIRESTONE LIGHT TRUCK - RECREATIONAL
- WILDERNESS AT - BY SIZE -

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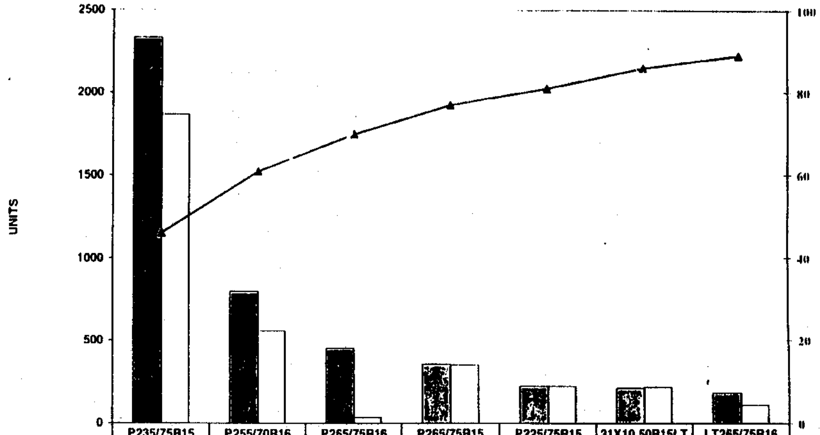

	P235/75R15	P255/70R16	P265/75R16	P265/75R15	P225/75R15	31X10.50R15LT	LT265/75R16
▬ CURRENT	2333	798	455	354	226	212	183
☐ PREVIOUS	1869	558	32	351	223	216	110
%CHG	24.8%	43.0%		0.9%	1.3%	-1.9%	66.4%
—▲— % OF TOTAL	46	61	70	77	81	86	89

CURRENT	5,459
PREVIOUS	4,057

B4B2

AMTS - 1999 VS 1998 YEAR END
FIRESTONE LIGHT TRUCK - RECREATIONAL
- WILDERNESS AT - BY SERVICE GROUP -

CONFIDENTIAL
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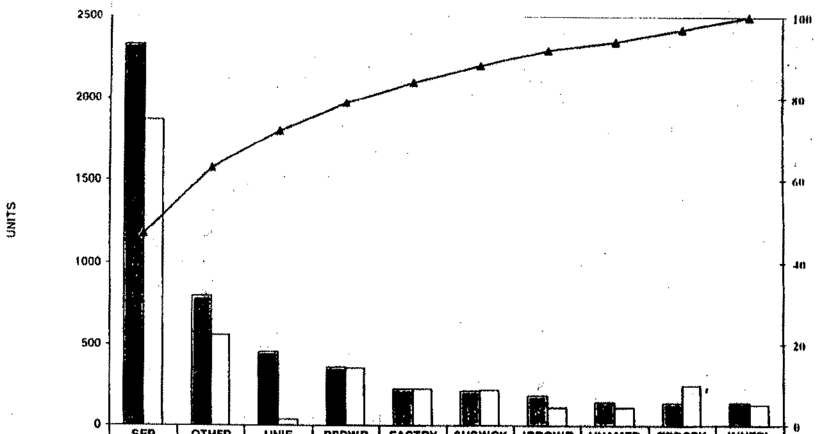

	SEP	OTHER	UNIF	RPDWR	FACTRY	SHSWCK	IRRGWR	UNAMED	TRDCRK	INNERL
■ CURRENT	2333	798	455	354	226	212	183	145	140	135
□ PREVIOUS	1869	558	32	351	223	216	110	108	245	129
%CHG	24.8%	43.0%		0.9%	1.3%	-1.9%	66.4%	34.3%	-42.9%	4.7%
▲ % OF TOTAL	47	63	72	79	84	88	92	94	97	100

CURRENT 4,868
PREVIOUS 5,103

DEALER VS. AMTS - 1999 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL

- BY SERVICE GROUP -

CONFIDENTIAL
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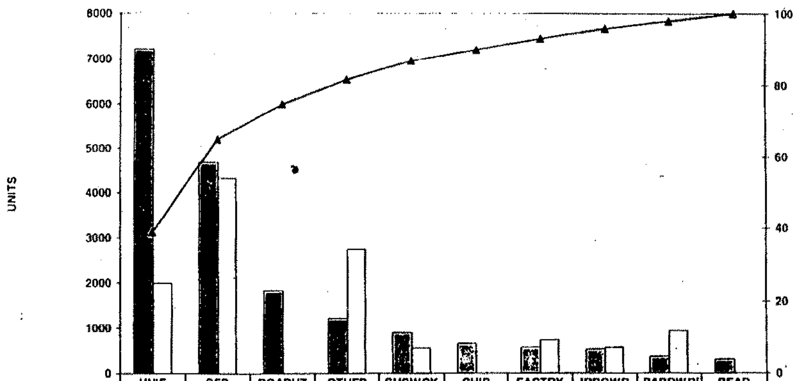

	UNIF	SEP	ROADHZ	OTHER	SHSWCK	CHIP	FACTRY	IRRGWR	RAPDWR'	BEAD
▬ DEALER	7221	4694	1846	1230	898	655	573	535	358	298
▭ AMTS	1991	4326	0	2746	543	0	731	564	934	0
%DIFF	262.70%	8.50%		-55.20%	65.40%		-21.60%	-5.10%	-61.70%	
DLR $/ADJ	$78.02	$37.72	$25.59	$56.49	$40.17	$41.29	$65.59	$32.41	$25.60	$39.19
AMTS $/ADJ	$51.35	$40.40	$0.00	$47.38	$44.45	$0.00	$52.43	$44.00	$34.73	$0.00
─▲─ DLR % OF TOT	39	65	75	82	67	90	93	96	98	100

DEALER	18846	$1,024,192
AMTS	12507	$582,305

AMTS - 1999 VS 1998 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL
- BY SERVICE GROUP -

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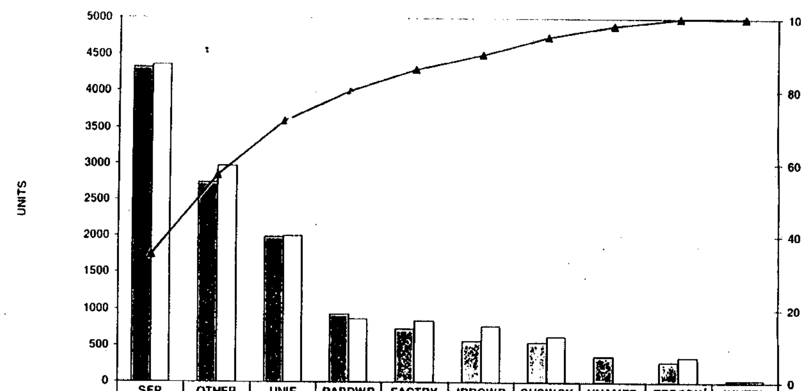

	SEP	OTHER	UNIF	RAPDWR	FACTRY	IRRGWR	SHSWCK	UNAMED	TRDCRK	INNERL
▬ CURRENT	4326	2746	1991	934	731	564	543	361	284	27
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CURR $/ADJ	$40.40	$47.38	$51.35	$34.73	$52.43	$44.01	$44.45	$117.45	$41.18	$50.83
PREV $/ADJ	$38.96	$47.33	$51.99	$37.77	$45.31	$48.06	$40.54	$47.52	$43.60	$45.05
—▲— % OF TOTAL	35	57	72	80	86	90	95	98	100	100

CURRENT	12507	$582,305
PREVIOUS	12827	$564,876

DEALER VS. AMTS - 1999 YEAR END
FIRESTONE LIGHT TRUCK - RECREATIONAL
- BY PATTERN -

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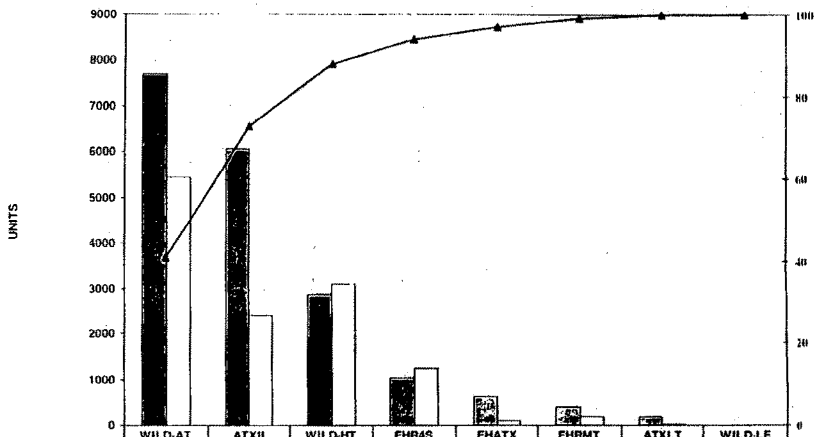

	WILD-AT	ATXII	WILD-HT	FHR4S	FHATX	FHRMT	ATXLT	WILD-LE
▬ DEALER	7692	6064	2877	1026	611	384	183	9
▭ AMTS	5459	2422	3090	1229	113	178	15	1
%DIFF	40.90%	150.40%	-6.90%	-16.50%	440.70%	115.70%		
—▲— DLR % OF TOT	41	73	88	94	97	99	100	100

DEALER	18848	$1,024,192
AMTS	12507	$582,305

AMTS - 1999 VS 1998 YEAR END
FIRESTONE LIGHT TRUCK - RECREATIONAL
- BY PATTERN -

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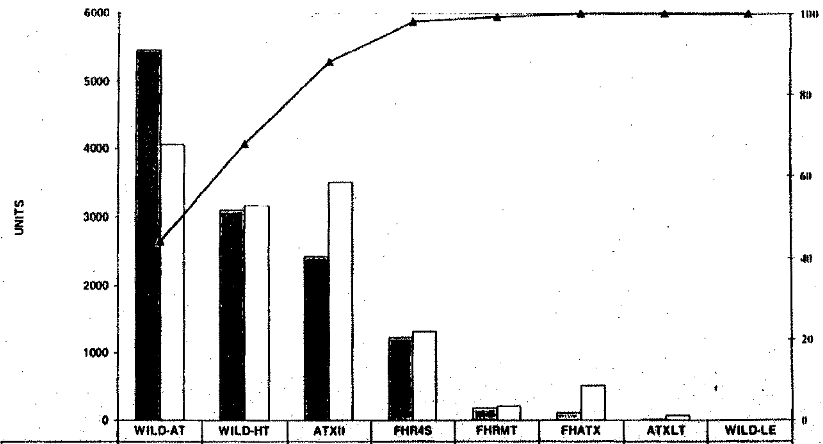


	WILD-AT	WILD-HT	ATXII	FHR4S	FHRMT	FHATX	ATXLT	WILD-LE
▆ CURRENT	5459	3090	2422	1229	178	113	15	1
▭ PREVIOUS	4057	3168	3510	1318	205	504	64	0
%CHG	34.60%	-2.50%	-31.00%	-6.80%	-13.20%	-77.60%	-76.60%	
—▲— % OF TOTAL	44	68	88	98	99	100	100	100

CURRENT	12507	$982,305
PREVIOUS	12827	$564,876

REPORT

We, Samuel Guillermo Ruh Rios, ID number 3,376,391, acting as President of the Institute for the Defense and Education of Consumers. (INDECU) and Jorge Dominguez , ID number 3,945,500, director of Inspection and supervision of the above mentioned institute, acting as Expert. By means of this document we are presenting this REPORT with its corresponding conclusions. This report has been made taking in consideration the following:

I. Interviews with Ford Motor Company and Bridgestone-Firestone employees.

II. Technical inspections performed to the Ford Explorer Truck , supplied by Ford MOTORS COMPANY at their plant located in the city of Valencia, Carabobo Estate.

III. Technical inspections performed to the Ford Explorer Truck, in public and private parking lots and other samples supplied by their owners.

IV. Technical inspections performed to several types of tires brand BRIDGESTONE-FIRESTONE, using the brand, model and size supplied by FORD MOTORS COMPANY and BRIDGESTONE-FIRESTONE.

V. Interview with the CEO of BRIDGESTONE Y FIRESTONE C.A. at their plant located in Valencia, Carabobo Estate.

VI. Documents supplied by FORD MOTORS COMPANY and BRIDGESTONE-FIRESTONE C.A.

VII. Documents from different sources published in the Domestic and in the United States press, via Internet.

VIII. Information obtained from the OWNERS ASSOCIATION (ASO EXPLORE) and personal complaints consigned to the Department of claims of the Department of Inspection and Supervision of this institute.

The present investigation was initiated by INDECU, as result of a series of complaints presented by owners and users of Ford Explorers Trucks presented at this institute. The majority of the complaints presented are for accidents occurred, sometimes resulting in the lost of human lives.

In addition to a series of news and complaints that were published in the International and domestic press related to the accidents that took place involving the vehicle Ford Explorer truck, equipped with BRIDGESTONE-FIRESTONE tires.

Some of the complaints reflect the failure in the tires BRIDGESTON FIRESTON and especially about the peeling of the tread of said tires and which the accidents that took place are attributed to .

We started our investigation with a sworn expert who helped with this investigation . This investigation was performed by CARLOS SALANOVA DIAZ, previously identified in this document.

We started the investigation with FORD MOTORS top executives, at INDECU's office in Caracas, after a citation was sent to them in order to clarify the situation.

After our meeting, and according to our agreement we visited FORD MOTORS COMPANY located in Valencia, Carabobo Estate. Where we asked for a full technical explanation with all the details related to the FORD EXPLORER TRUCK. In this

meeting were present the President and top executives of that company.
After this meeting we set up an appointment with BRIDGESTON FIRESTONE . The meeting took place at INDECU in Caracas, where upon our request we performed an inspection at their plant located in Valencia , Carabobo Estate.

That same afternoon we met again with the CEO of FORD MOTORS COMPANY , as a result of this meeting we visited for the second time the assembly plant located in Valencia where we performed a second inspection of a FORD EXPLORER TRUCK , and were given a technical explanation on the vehicle for the second time.
During all our visits we gathered important documents that support this investigation as well as samples of the tires and technical information on the FORD EXPLORER TRUCK and the BRIDGESTONE FIRESTONE tires.

The Consumer Protection Law, Article 1 and 72, grants us the power to defend the interest of the consumers. For this reason and for all the material and human losses related directly with the use of this vehicle equipped with tires that come from different plant locations and because the companies are blaming each other, therefore making it more difficult to comprehend the cause of these accidents and the responsible parties, we decided to initiate this investigation. We investigating everything related to the tires BRIDGESTONE FIRESTONE and original equipment for the FORD MOTOR EXPLORER.

Initially we asked both companies to give us an explanation of why it was decided to equip the EXPLORER with these tires brand BRIDGESTONE FIRESTONE, model WILDERNESS AT, white letter 255-70 R 16. This question was answered in the first letter that we received and which explains that Bridgestone Firestone received a request to manufacture a tire for the Ford Explorer

Truck with the specs' P255/70R16 ,and the reason for this request was because it is the same tire used in the Explorers in the United States of America. This letter was dated 01-05-1995, which I am attaching and is marked with the letter `A`. This tire was to be manufacture using two (2) layers or canvas of steel and two(2) of polyester, according to the BRIDGESTONE FIRESTONE report, marked as `B` and the approved prints, marked as `C`. This demonstrates that both companies agreed that is was appropriate and convenient to use this tire on the Ford Explorer . We have to point out that the specs for this type states that it should not be used on vehicles that travel at speeds above 140 KM per hour, with compressed air ranging between thirty two (32) pounds (minimum pressure) and thirty five (35) pounds (maximum pressure) . We would like to point out that Bridgestone Firestone brochures for consumers of their products states that the recommended air pressure for these tires on the Ford Explorer should be used at the minimum pressure of thirty two (32) pounds to guarantee a perfect performance. See attachment marked with the letter `D`.

BRIDGESTONE FIRESTONE supplied FORD MOTORS COMPANY from 1997 to 1999 with thousands of tires with these specifications and which were incorporated as the Original Equipment for the Ford Explorer truck manufactured at the FORD MOTORS COMPANY plant located in Valencia, Carabobo Estate.

From 1998 and thereafter, a series of vehicle accidents with the vehicle before mentioned took place. These accidents had as characteristics the dramatic flipped over of the vehicle and the peeling off the tire's tread in one or more tires. It is important to point out that the accidents in these vehicles caused numerous deaths and injuries and irreparable damages to the vehicles.

After these accidents were know to the public and as their frequency increased, both companies became concern and started a series of joined meetings aiming to determining the causes of the

mysterious accidents. The first suspicions were on the tires. Therefore, FORD MOTOR COMPANY asked BRIDGESOTNE FIRESTONE, not only for their opinion, but also to redesign the tire. Both companies reached an agreement that the new tire should have an added extra layer of nylon (CAP PLY) to the ones it already have (two layers of polyester and two of steel) in order to make it more resistant and to withstand speeds above (140 KM per hour up to 180 Km per hour). This tire would have the letter 'S' embossed which means that it has the ability to withstand speeds up to 180 KM per hour.
While all the agreed redesigns were taking place, uninformed and unwarned owners and users of the Ford Explorer continued the use of their vehicle. Not knowing the risks they were talking of endangering their lives and their families.

We would like to inform that due to the Ford Explorer's design it can easily surpass the speed of (140 KM/hour). Starting in 1999, after the agreement between this two companies, the companies started to use the redesign tires on the Ford Explorer. In other words, the tires with two (2) layers of steel, two (2) of polyester and one (1) of nylon. We say that they were presumably to be used. However, during our visit to the BRIDGESONTE FIRESTONE plant located in Valencia, one of our investigating officers, Mr. Rafael Carabano, discovered that the ' redesigned ' tires with the embossed letter 'S', manufactured with five layers (two of polyester, two of steel and one of nylon) was not true. Instead, it was a fraud. When a section was cut out of the tire to observe the position and presence of the tread, there were only (4) (two of polyester and two of steel), lacking the presence of the nylon layer which it was supposed to be added according to the redesign. The users of Ford Explorer were despicably tricked when the units were equipped with a tire that did not correspond to the specifications to the vehicle and the users were not informed that the original equipment was not the appropriate. In addition to

this they were never called to have substitutions made in due time and they are to be blamed for covering up this information .
The accidents are taking place for two reasons:

- There are still in circulation thousands of Ford Explorer equipped with the unsuitable tires.
- The redesign does not exist.

In this regards we are very outraged and surprised to have received a letter signed by a legal representative of BRIDGESTONE FIRESTONE with an attachment of his legal power that grants this persons to be its legal representative. In this letter Bridgestone apologizes and recognizes the ` insignificant error`. The fraud that probably caused the death of many Venezuelans. Attachment marked with letter `F`.
We believe that here exists a share responsibility between both companies and it is what we can call a conspiracy against the users of Ford Explorer Truck and other vehicles. Several people, including some executives of both companies met to have a get out plan out of this situation that was affecting their economical interests, therefore resulting in damages, destruction and death. Attachment marked as `G`.
A parallel exact situation to the one in Venezuela was also developing in the United States. The same vehicle was involved in accidents where they flipped over. There were injuries and deaths and also the tires tread separated. A surprising decision was made by the company BRIDGESTONE FIRESTONE, which decided to recall from the market six and a half million tires similar to the ones described above, which caused among North Americans a Big scandal. FORD MOTORS COMPANY accuses BRIDGESTONE FIRESTONE to be the cause of the accidents of their vehicle and at the same time BRIDGESTONE FIRESTONE replies that it is the Ford Explorer that causes the accidents and not their products. Attachment marked ` H`.
BRIDGESTONE FIRESTONE informed that it will only recall from the Venezuelan market (3,010) tires manufactured in United

States in their plant located in DECATUR ILLINOIS, which were imported by them in 1995 and which also correspond to the tires recalled in the United States. Attachment , marked as `I`.
The same company stated after publishing notices informing the users to change the tires through the auto dealers that only `one type of tire` was changed. However, accidents continued to happen in Venezuela and it is worth repeating again and again that the tires manufactured in Venezuela with the same design as the ones recalled in The United States were still having problems with the peeling of the tire's tread.

This makes us conclude that the tires made in the United States and the ones manufactured in Venezuela of the same brand, design, components and raw materials have the same defects. It does not matter where they are manufactured. If they comply with the same prints, design, components and raw materials will have the same defects and at the same time they will fail anywhere. Here comes the coincidences between the incidents that took place in Venezuela and the ones in the United States.

We conducted a more detailed investigation and our expert advised us to also investigate the Ford Explorer Truck. We visited twice the FORD MOTORS COMPLANY, located in Valencia, Carabobo Estate. We met with technicians in the plant and out of it. We also examined Ford Explorers involved in accidents, drove some of them, privately owned, reviewed the manuals, components and accessories, listed to user's opinions both involved and not involved in accidents and inspected very carefully FORD MOTORS' COMPANY of Venezuela technical analysis which had as an example an Explorer without the body.
The first thing we noticed is that is has a very soft suspension system that diverts from the traditional systems used in multi purpose vehicles. These vehicles are tall and narrow, therefore are equipped with a firm suspension system to provide them with stability.

Then we asked ourselves the following questions . Wouldn't this Vehicle be very unstable if it travels at 140 KM per hour, having a tall and narrow design, tire pressure of 32 pounds, carrying (5) passengers and swinging violently?

We also observed some curious details such as : FORD MOTORS COMPANY without any advertising was encouraging the change of the original shock absorbers for firmer or of harder shocks. All these had to be done using a very complicated mechanical task that involved pulling out the gas tank of the vehicle, solder metal sheets to the rear crossbar in order to fit the harder shocks. Thereafter, they commercialized a crossbar that would be place on top of the original one in order to accomplish the same function described above. But, this is not only what we noticed, but also noticed that FORD MOTORS COMPANY `s stickers adhered to the vehicles recommend the use of 28 pounds of pressure, 4 pounds less than the recommended by the manufacturer. Attachment, marked as `J`.

We concluded that all the mechanical changes and recommendations on the tire air pressure were aiming towards avoiding the instability and manageability of the vehicle in difficult and emergency situations that the Ford Explorer has been facing.

In order to make the shock absorbers and the cross bar changes the FORD MOTORS dealers were charging the amount of 273.000 bolivares. Attachment, marked as `k`.

Here are the following questions:

i. What about the thousands of owners who did not implemented this mechanical change, because they did not have the money or were not informed of the real reasons behind it? What would happen to them?

ii. What about the tires that should perform at 32 pounds and which according to FORD MOTORS COMPANY should have a pressure of 28 pounds. What could happen to the vehicle if it is carrying the weight of 5 people and the load for vacationing? There is no doubt that these conditions are not the appropriate for these tires . The situation is worsen by the fact that if on top of all the changes we add the weight difference of 200 kilos. This excess weight was detected when a Ford Explorer with a full tank of gas was weighted in a public scale in presence of witnesses and a sworn expert. This weight differs with the weight stated in manuals and documents from the manufacturer. Attachment, marked as 'L'.

iii. Why did FORD MOTORS COMPANY asked BRIDGESTONE FIRESTONE for this type of tire instead of asking for a more suitable one with all the specifications that we observed?

iv. Why BRIDGESTONE FIRESTONE, which is obviously a company that knows about tires, did not refuse to supply to FORD MOTORS COMPANY a tire that was not suitable for the application. Furthermore, it was supplied without making any remarks on the subject?

v. Why is it that the consumers were not informed when both companies found out about the error?

vi. Why did they wait so long until people was injured or dead to recognize in public their shared responsibility?

We also received some information from Ford Explorer owners that the electronic module called GEM which is a multifunction device (turns the windshield wipers on and off, rolls the windows up and down and activates de system (translator note: this is not a complete sentence. It is missing few words, possibly the 4 x4, by looking at the context) sometimes failed and at high speed would activate the 4x4 system), producing a jerk and abrupt in the steering system of the vehicle. Even though we asked these questions several times to the technicians at FORD MOTORS COMPANY, it was never admitted until Friday August 25th 2000, after we had made this discovery, that they accepted this failure in a report obtained from NHTSA, Attachment 'M'

We also received information on the existence of a speed regulator module (we are still investigating this matte) .This device is not standard on all vehicles.
We inspected tree Ford Explorers and all three reached a speed of 180 KM per hour.
Also attached, marked with the letter 'N' and 'O' is the result of a lab test analysis on a BRIDGESTONE FIRESTONE tire model WILDERNESS AT P255/70 R16 which had for objective the simulation of maximum conditions for the use of this tire on this vehicle . The results showed that at a speed of 180 KM per hour, at 8 minutes and 46 seconds a partial tread separation took place .

Due to all of he above reasons is that we insist and point out the following.

1. It is obvious that both the Ford Explorer truck and the tires have problems in their design and structure that need to be remedy en future designs.

2. In the same manner as FORD MOTOR COMPANY ordered the replacement free of charge tires, it should also replace shock absorbers and perform the reinforcement of the cross bar.

3. Recommend that the tires have a minimum pressure of 32 pounds, having previously verified that said pressure will stabilize the vehicle and give to it the safety and control over the steering of the vehicle.

4. In relationship to BRIDGESTONE FIRESTONE, since the company has already recognize the faulty tires, they need to recall the tires that are in the stocks of the points of sale(since we feel this is a fraudulent sale) as well as the ones currently on all vehicles since there is not a way to proof the true components of the tires, unless a cut is made to verify the presence or not of the nylon layer.

Both companies are at fault in covering up the information, resulting in catastrophic accidents. For this reason, we believe that all persons involved in these accidents should be compensated for the material and moral damages. All directors should face their responsibilities before the Competent Courts for all omissions and negligence that could have happen when they manufactured and produced vehicles and tires that could have had errors in their design . Due to all these many users and owners of these products have lost their lives o the lives of love ones.

Caracas August. 30th, 2000

There is a seal a weal with the Venezuelan coat of arms and around
Bolivarian Republic of Venezuela
Department of Production and (illegible)
INDECU
Presidency
(illegible)

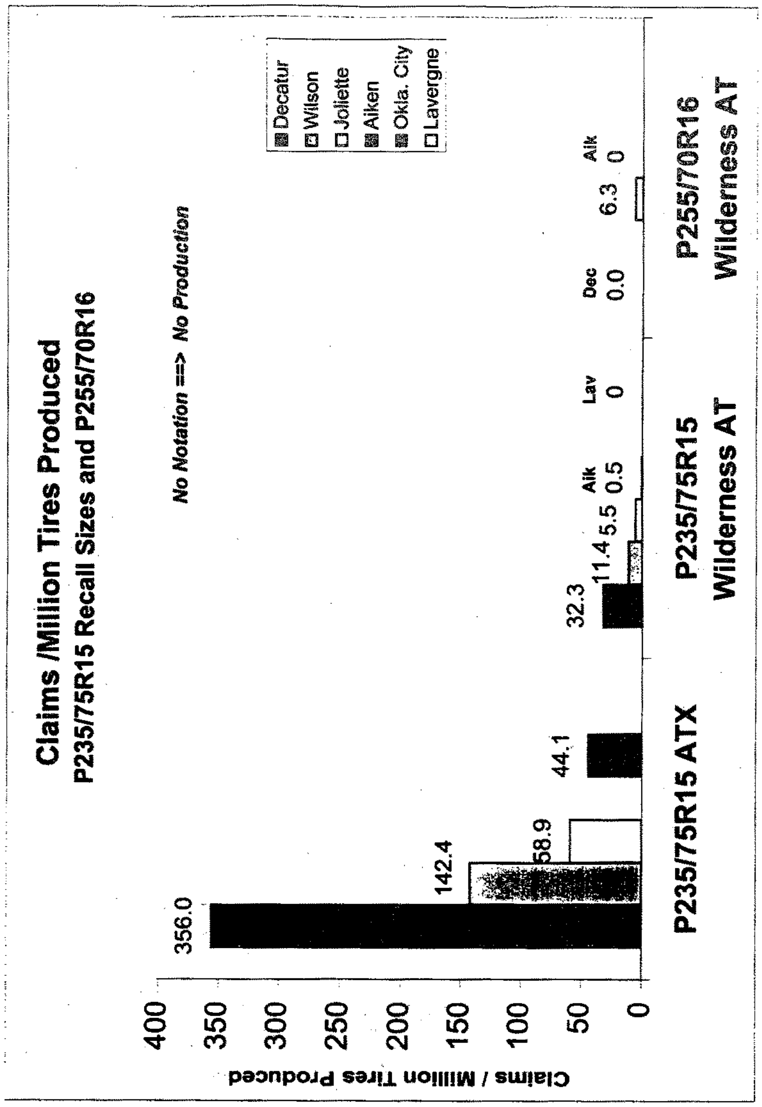
Signed by

Jorge Dominguez Cova
Director of Inspections

Carlos Salanova Diaz
Expert investigator

I Alicia Hinson certify that this is a true translation from Spanish to English of the documents attached. This translation has been done in the best of my abilities and I am not legally responsibly for error or omissions.

Alicia Hinson
Member of the American Translator Association
214545


Claims /Million Tires Produced
P235/75R15 Recall Sizes and P255/70R16
No Notation ==> No Production
■ Decatur
▨ Wilson
☐ Joliette
■ Aiken
■ Okla. City
☐ Lavergne
Claims / Million Tires Produced
400
350
300
250
200
150
100
50
0
356.0
142.4
58.9
44.1
32.3
11.4
5.5
Aik
0.5
Lav
0
Dec
0.0
6.3
Aik
0
P235/75R15 ATX
P235/75R15
Wilderness AT
P255/70R16
Wilderness AT

Firestone Test Sheets

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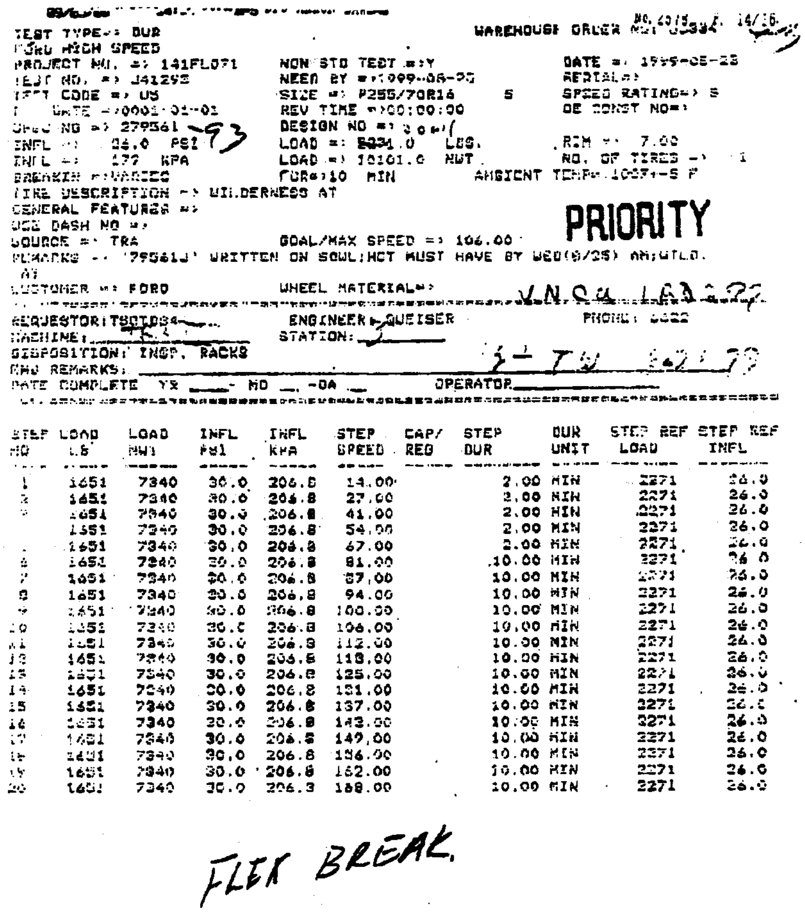
test data refers to
Non-relevant tire.

Firestone Test Sheets

Entire Page Redacted

test data refers to
non-relevant tire.



TEST TYPE=> DUR
FORD HIGH SPEED
PROJECT NO. => 141FL071
TEST NO. => J41293
TEST CODE => US
DATE =>0001-01-01
SPEC NO => 279561 -93
INFL => 26.0 PSI
INFL => 179 KPA
BREAKIN =>VARIED
TIRE DESCRIPTION => WILDERNESS AT
GENERAL FEATURES =>
USE DASH NO =>
SOURCE => TRA
REMARKS => '79561J' WRITTEN ON SOWL;HCT MUST HAVE BY WED(8/25) AM;WILD. AT
CUSTOMER => FORD

NON STD TEST =>Y
NEED BY =>1999-08-25
SIZE => P255/70R16 S
REV TIME =>00:00:00
DESIGN NO => 20 W/(
LOAD => 2271.0 LBS.
LOAD => 10101.0 NWT
FOR=>10 MIN
GOAL/MAX SPEED => 106.00
WHEEL MATERIAL=>

WAREHOUSE ORDER NO: 03384 14/16
DATE => 1999-08-23
SERIAL=>
SPEED RATING=> S
OE CONST NO=>
RIM => 7.00
NO. OF TIRES => 1
AMBIENT TEMP=> 100+-5 F

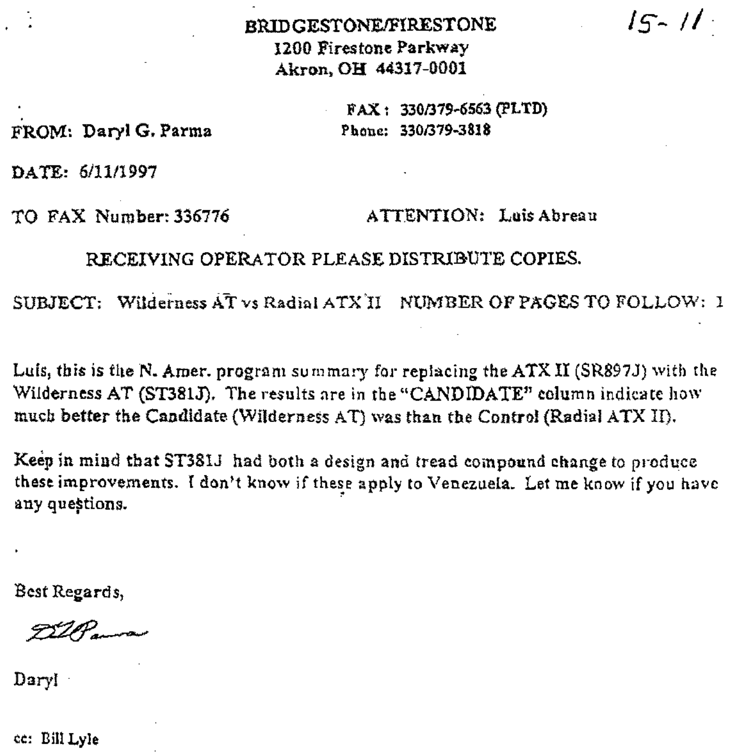
PRIORITY

V.N.Ca LAD 2 27

REQUESTOR: TSOTD34
ENGINEER: QUEISER
PHONE: 6622
MACHINE:
STATION:
DISPOSITION: INSP. RACKS
MHO REMARKS:
DATE COMPLETE YR ____- MO __-DA __
OPERATOR________

STEP NO	LOAD LB	LOAD NWT	INFL PSI	INFL KPA	STEP SPEED	CAP/ REG	STEP DUR	DUR UNIT	STEP REF LOAD	STEP REF INFL
1	1651	7340	30.0	206.8	14.00		2.00	MIN	2271	26.0
2	1651	7340	30.0	206.8	27.00		2.00	MIN	2271	26.0
3	1651	7340	30.0	206.8	41.00		2.00	MIN	2271	26.0
4	1651	7340	30.0	206.8	54.00		2.00	MIN	2271	26.0
5	1651	7340	30.0	206.8	67.00		2.00	MIN	2271	26.0
6	1651	7340	30.0	206.8	81.00		10.00	MIN	2271	26.0
7	1651	7340	30.0	206.8	87.00		10.00	MIN	2271	26.0
8	1651	7340	30.0	206.8	94.00		10.00	MIN	2271	26.0
9	1651	7340	30.0	206.8	100.00		10.00	MIN	2271	26.0
10	1651	7340	30.0	206.8	106.00		10.00	MIN	2271	26.0
11	1651	7340	30.0	206.8	112.00		10.00	MIN	2271	26.0
12	1651	7340	30.0	206.8	118.00		10.00	MIN	2271	26.0
13	1651	7340	30.0	206.8	125.00		10.00	MIN	2271	26.0
14	1651	7340	30.0	206.8	131.00		10.00	MIN	2271	26.0
15	1651	7340	30.0	206.8	137.00		10.00	MIN	2271	26.0
16	1651	7340	30.0	206.8	143.00		10.00	MIN	2271	26.0
17	1651	7340	30.0	206.8	149.00		10.00	MIN	2271	26.0
18	1651	7340	30.0	206.8	156.00		10.00	MIN	2271	26.0
19	1651	7340	30.0	206.8	162.00		10.00	MIN	2271	26.0
20	1651	7340	30.0	206.8	168.00		10.00	MIN	2271	26.0

FLEX BREAK.



15- 11

BRIDGESTONE/FIRESTONE
1200 Firestone Parkway
Akron, OH 44317-0001

FAX: 330/379-6563 (PLTD)
Phone: 330/379-3818

FROM: Daryl G. Parma

DATE: 6/11/1997

TO FAX Number: 336776 ATTENTION: Luis Abreau

RECEIVING OPERATOR PLEASE DISTRIBUTE COPIES.

SUBJECT: Wilderness AT vs Radial ATX II NUMBER OF PAGES TO FOLLOW: 1

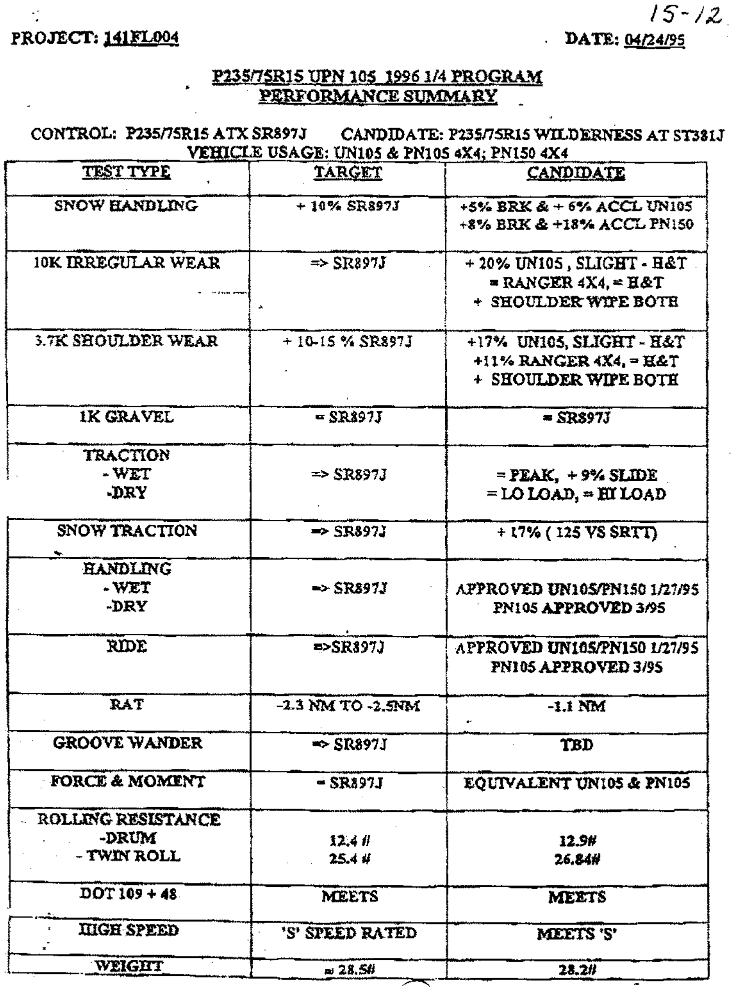
Luis, this is the N. Amer. program summary for replacing the ATX II (SR897J) with the Wilderness AT (ST381J). The results are in the "CANDIDATE" column indicate how much better the Candidate (Wilderness AT) was than the Control (Radial ATX II).

Keep in mind that ST381J had both a design and tread compound change to produce these improvements. I don't know if these apply to Venezuela. Let me know if you have any questions.

Best Regards,

Daryl

cc: Bill Lyle



15-12

PROJECT: 141FL004 **DATE:** 04/24/95

P235/75R15 UPN 105 1996 1/4 PROGRAM
PERFORMANCE SUMMARY

CONTROL: P235/75R15 ATX SR897J CANDIDATE: P235/75R15 WILDERNESS AT ST381J

VEHICLE USAGE: UN105 & PN105 4X4; PN150 4X4

TEST TYPE	TARGET	CANDIDATE
SNOW HANDLING	+ 10% SR897J	+5% BRK & + 6% ACCL UN105 +8% BRK & +18% ACCL PN150
10K IRREGULAR WEAR	=> SR897J	+ 20% UN105 , SLIGHT - H&T = RANGER 4X4, = H&T + SHOULDER WIPE BOTH
3.7K SHOULDER WEAR	+ 10-15 % SR897J	+17% UN105, SLIGHT - H&T +11% RANGER 4X4, = H&T + SHOULDER WIPE BOTH
1K GRAVEL	= SR897J	= SR897J
TRACTION - WET -DRY	=> SR897J	= PEAK, + 9% SLIDE = LO LOAD, = HI LOAD
SNOW TRACTION	=> SR897J	+ 17% (125 VS SRTT)
HANDLING - WET -DRY	=> SR897J	APPROVED UN105/PN150 1/27/95 PN105 APPROVED 3/95
RIDE	=>SR897J	APPROVED UN105/PN150 1/27/95 PN105 APPROVED 3/95
RAT	-2.3 NM TO -2.5NM	-1.1 NM
GROOVE WANDER	=> SR897J	TBD
FORCE & MOMENT	= SR897J	EQUIVALENT UN105 & PN105
ROLLING RESISTANCE -DRUM - TWIN ROLL	12.4 # 25.4 #	12.9# 26.84#
DOT 109 + 48	MEETS	MEETS
HIGH SPEED	'S' SPEED RATED	MEETS 'S'
WEIGHT	≈ 28.5#	28.2#

CONFIDENTIA
ENTIRE PAGE

BRIDGESTONE/FIRESTONE TIRE SALES COMPANYINTEROFFICE MEMO

TO: M. Hamaya **DATE:** June 24, 1998

FROM: K. Ball **REF. NO:** KB-97-033

SUBJECT: **1997 Minor P/L Year-End Analysis**

Enclosed is the 1997 Minor PL Activity Summary for BFTS.

If you have any questions or comments, please advise.

Sincerely,

Ken W. Ball
Senior Manager
Sales Engineering

KWB dg

cc Hal Horton
Gary Garfield (Return to Sales Engineering)
Dave Laubie

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LT CLAIMS BY PATTERN

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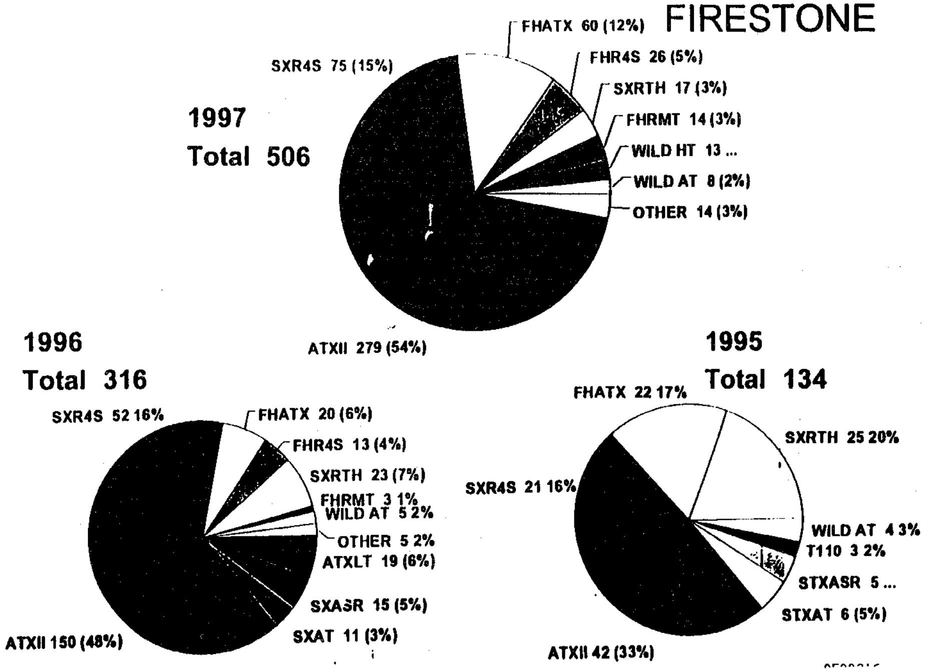
FIRESTONE



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1997 FS LT CLAIMS BY PATTERN BY DAMAGE TYPE

Pattern	SEP	R/H	Other	Total
ATX II	259*	13	7	279
SXR4S	49	23	3	75
FHATX	52	6	2	60
FHR45	21	1	4	26
SXRTH	16	1		17
FHRMT	10	3	1	14
WILD HT	1	12		13
WILD AT	1	7		8
MISC.	8	2	4	14
TOTAL	417	68	21	506

* SIZE: P235/75R15 = 238 UNITS.

SERV. COND 136 = 252 UNITS.

DOT PLANT W2 = 96 UNITS.
VD = 93 UNITS.
VN = 47 UNITS.
225 TOTAL

DOT YR 1993 = 79 UNITS.
1994 = 71 UNITS.
1992 = 45 UNITS.
1995 = 17 UNITS.
OTHER = 26 UNITS.
255 TOTAL

CONFIDENTIAL
ENTIRE PAGE

Count of BRANDS	RV_COND_GRP							
PATTERN	SEP	CUT SEP	ROAD HAZARD	CHIPPING	IRR WEAR	OTHER	MISC	Grand Total
ATXII	469		8	1	1	4	1	484
ATXLT	18							18
FHATX	65		1					66
FHR4S	38	1	4					43
FHRMT	10							10
FHSS10	1							1
SX23SPS	1							1
SXASR	3							3
SXAT	12		13					25
SXR4S	103		19			1		123
SXRTH	6							6
T110	1							1
WILD-AT	10		15				1	26
WILD-HT	15		12			1	2	30
WILDSPS	1							1
Grand Total	753	1	72	1	1	6	4	838

1998 FS LTR CLAIMS BY PATTERN BY DAMAGE TYPE

P235/75R15 ATXII SEP(449) IS 92.8% OF ALL ATXII CLAIMS AND 53.6% OF ALL FS LTR CLAIMS FOR THE YEAR
SEP (753) IS 89 6 % OF ALL FS LTR CLAIMS SUBMITTED

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CONFIDENTIAL
ENTIRE PAGE

Count of BFS_REF_NO	prod											
PLANT		90	91	92	93	94	95	96	97	88	89	Grand Total
	6											6
H4								1				1
HY		1				3	1					5
VD	1	5	2	23	41	120	145	151	29	4	5	526
VN		3	4	26	31	14	9	8	5	6	3	109
W1								2	4			6
W2			7	29	52	46	17	22	8	1	3	185
Grand Total	7	9	13	78	124	183	172	184	46	11	11	858

FS [illegible]R PLANT BY PROD YR

CONFIDENTIAL, ENTIRE PAGE

Count of BFS_REF_NO	prod											
PATTERN		90	91	92	93	94	95	96	97	88	89	Grand Total
ATXII	4	3	11	60	90	127	95	83	2	1	8	484
ATXLT		2	1	2	5	2	3	3				18
FHATX				4	9	15	14	23	1			66
FHR4S				3	8	6	10	10	5		1	43
FHRMT				1		3	1	4	1			10
FHSS10										1		1
SX23SPS						1						1
SXASR			1	1				1				3
SXAT		2			1	3	3	5	7	4		25
SXR4S	1	1		7	11	23	40	26	12	2		123
SXRTH						3	1				2	6
T110		1										1
WILD-AT	1						4	9	10	2		26
WILD-HT	1						1	19	8	1		30
WILDSPS								1				1
Grand Total	7	9	13	78	124	183	172	184	46	11	11	838

FS LTR PATTERN BY PROD YR

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ENTIRE PAGE

FS LT BY DOT MFG YEAR

CLAIM YEAR DOT YEAR	1997		1996		1995	
	N	%	N	%	N	%
0	13	3	12	4	16	12
1	18	4	31	10	16	12
2	69	14	74	24	31	24
3	117	24	67	21	15	12
4	121	25	54	17	17	13
5	85	17	37	12	13	10
6	47	10	19	6	13	10
7	16	3	5	2	1	1
8	1	0	4	1	4	3
9	4	1	9	3	3	2
?	15		3		5	
TOTAL	506		315	100	134	100

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ENTIRE PAGE

1997 FS LT CLAIMS BY PATTERN BY DOT PLANT CODE

Pattern	HY	VD	VN	WI	W2	7B	OTHER	?	Total
ATX II	1	117	51		101		3	6	279
SXR4S		39	24	4	7			1	75
FHATX		54	1		3	1	1		60
FHR45		24						2	26
SXRTH		17							17
FHRMT		12	1					1	14
WILD HT			1		10	1	1		13
WILD AT			3		5				8
MISC.	1	2	6				2	3	14
TOTAL	2	265	87	4	126	1	7	14	506

CONF
ENTII

Count of BFS_REF_NO	PLANT							
PATTERN		H4	HY	VD	VN	W1	W2	Grand
ATXII	3	1	4	258	69	2	147	48
ATXLT				18				18
FHATX				65	1			66
FHR4S				39	3	1		43
FHRMT				10				10
FHSS10				1				1
SX23SPS				1				1
SXASR				3				3
SXAT				17	7		1	25
SXR4S	1			87	23	3	9	123
SXRTH				6				6
T110			1					1
WILD-AT	1			15	3		7	26
WILD-HT	1			6	2		21	30
WILDSPS					1			1
Grand Total	6	1	5	526	109	6	185	838

57% OF ALL LTR IS ATXII
53% OF THOSE ATXII'S CAME FROM ONE PLANT
62% OF ALL LTR FROM ONE PLANT
NO PLANT WAS RUN FLAT DOT MISSING

FS LTR PATTERN BY PROD YR

CONFIDENTIAL
ENTIRE PAGE

FHATX	015573	VD	5	$	2,039.88
LEATLT	015576	VD	4	$	1,047.81
ATXII	015583	VD	5	$	1,071.75
ATXII	015589	VD	6	$	624.45
ATXII	015602	VD	6	$	1,520.90
FHATX	015611	VD	5	$	2,924.56
SXR4S	015635	VD	7	$	1,021.43
SXR4S	015636	VD	0	$	836.75
SXR4S	015681	VD	5	$	1,920.66
ATXII	015682	VD	5	$	1,129.66
SXR4S	015696	VD	6	$	994.40
ATXII	015711	VD	6	$	856.93
ATXII	015753	VD	4	$	262.96

$ 745,695.13
$ 332,062.90
$ 1,077,758.03

COST OF DECATUR PRODUCED LTR ALL BRANDS

REDACTED

X
BFVZ

From: FTRQA05 --VM4 Date and time 01/12/99 15:58:00
To: INTERNET--IBMMAIL
cc: FTRQA12 --VM4 R O MARTIN COR FTRTD6A --VM4 B E LINDENMUTH
FTRTDE7 --VM4 BILL W LYLE RLM --VM4 ROGER MITZNER
KLS --VM4 KAREN STEVENS FTRQA65 --VM4 G G BECKWITH
FTRQA14 --VM4 G A RASOR

FROM: R.G. DUVALL
SUBJECT: WILSON P255/70R16 WILDERNESS TIRES SENT FROM VENEZUELA
TO: L.E. Abreu

/INTERNET
/TO TECNICO1@TELCEL.NET.VE
/REPORT
/END

Louis, our Akron Q.A. Department had the two Wilson tires that you had sent to us tested on the "S" Speed Rated High Speed test. These tires were the same week as those that VZ tested on the "Q" test, (W2-198). The test results were very favorable and do not compare with the VZ results.

Akron test results were: 1 min. @ 124 mph (200 kph)
("S" test) 9 min. @ 118 mph (190 kph)

Venez. test results were: 8 min. @ 106 mph (170 kph)
("Q" test) 6 min. @ 106 mph (170 kph)

SAE minimum "S" Test = 10 min. @ 112 mph
SAE minimum "Q" Test = 10 min. @ 99 mph

The Tire produced at Wilson is an "S" Rated tire.

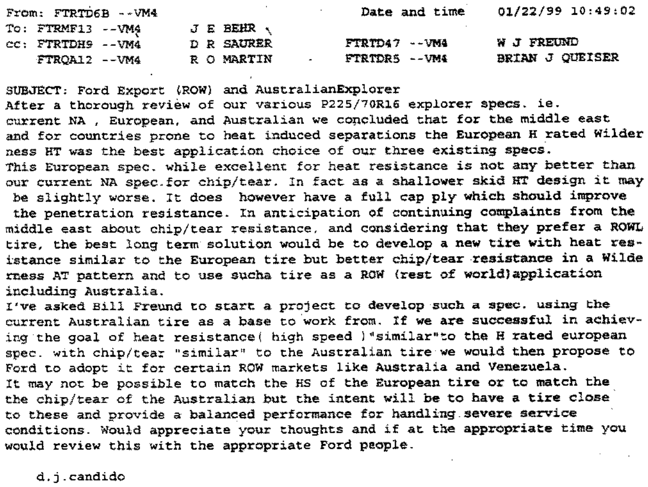
We also went back 3 years in Wilson test data and found no results as low as those reported by Venez.

Because of this could you please foreward to me your test conditions that were run on these tires as they appear now to be outliers. (I.E., test Inflation, test load, rim width and especially test room temperatures at at the time of the tests.)

Best regards and thanks for your help.

Rick Duvall
Manager Corp. Quality Assurance, Akron Oh.
E-Mail: RICK_DUVALL@BFS.E-MAIL.COM

R.G. DUVALL
Q.A., ext. 3726
EMAIL: rick_duvall@bfs.e-mail.com



From: FTRTD6B --VM4 Date and time 01/22/99 10:49:02
To: FTRMF13 --VM4 J E BEHR
cc: FTRTDH9 --VM4 D R SAURER FTRTD47 --VM4 W J FREUND
FTRQA12 --VM4 R O MARTIN FTRTDR5 --VM4 BRIAN J QUEISER

SUBJECT: Ford Export (ROW) and AustralianExplorer

After a thorough review of our various P225/70R16 explorer specs. ie. current NA , European, and Australian we concluded that for the middle east and for countries prone to heat induced separations the European H rated Wilderness HT was the best application choice of our three existing specs.

This European spec. while excellent for heat resistance is not any better than our current NA spec.for chip/tear. In fact as a shallower skid HT design it may be slightly worse. It does however have a full cap ply which should improve the penetration resistance. In anticipation of continuing complaints from the middle east about chip/tear resistance, and considering that they prefer a ROWL tire, the best long term solution would be to develop a new tire with heat resistance similar to the European tire but better chip/tear resistance in a Wilderness AT pattern and to use sucha tire as a ROW (rest of world)application including Australia.

I've asked Bill Freund to start a project to develop such a spec. using the current Australian tire as a base to work from. If we are successful in achieving the goal of heat resistance(high speed)"similar"to the H rated european spec. with chip/tear "similar" to the Australian tire we would then propose to Ford to adopt it for certain ROW markets like Australia and Venezuela.

It may not be possible to match the HS of the European tire or to match the the chip/tear of the Australian but the intent will be to have a tire close to these and provide a balanced performance for handling severe service conditions. Would appreciate your thoughts and if at the appropriate time you would review this with the appropriate Ford people.

d.j.candido

343

X
BFVZ

BRIDGESTONE FIRESTONE VENEZOLANA C.A.
INTEROFFICE

DATE: Valencia, 26 / 01 / 99

TO: MR. BRUCE HALVERSON

CC: MESSRS.: H. MATSUMOTO / L. ANDRADE - BFVZ
W. LYLE - AKRON

FROM: LUIS E. ABREU

SUBJECT: ***P255/70 R16 WILDERNESS AT ADJUSTMENT DATA.***

We revised the adjustment data for this tire size and found out the following:

1. BFVZ and USA made tires were store under the same code (015 P255/70 R16 Wilderness AT white letters).
2. All adjusted tires BFVZ or USA were identified with the international serial system in our adjusted tire data base.
3. Some adjustment fill out form have the last three digits DOT serial. The Adjusters are translating the DOT serial to the international serial number.

   Example: DOT last three digits 157 is written H17Z (April 97)

   Our adjustment tire data base accept only the international serial code.
4. Claims due to impact break are not adjusted.

We went over each individual adjusted tire sheet regarding tread and belt sep. and could identified some tires made in the USA (Three digits DOT Serial). The data is as follows:

- Total tires with tread or belt sep.: 47
- Tires with international serial code: 34
- Tires with three digits DOT Serial (USA): 13

BY DEFFECTS	SERIAL INTERNATIONAL	DOT
CODE 235 BELT EDGE SEP.	19	8
CODE 136 BELT LEAVING BELT	12	3
CODE 137 BREAKER LEAVING CASING	2	0
CODE 135 TREAD LEAVING CASING	1	0
CODE 139 TREAD LEAVING BELT	0	1
CODE 230 SHOULDER SEP. BETWEEN	0	1
RUBBER AND CASING		
	34	13

- TOTAL TIRES SOLD BFVZ 69.456 (19.388 O.E.)
- TOTAL TIRES SOLD USA ~~[illegible]~~ 58641

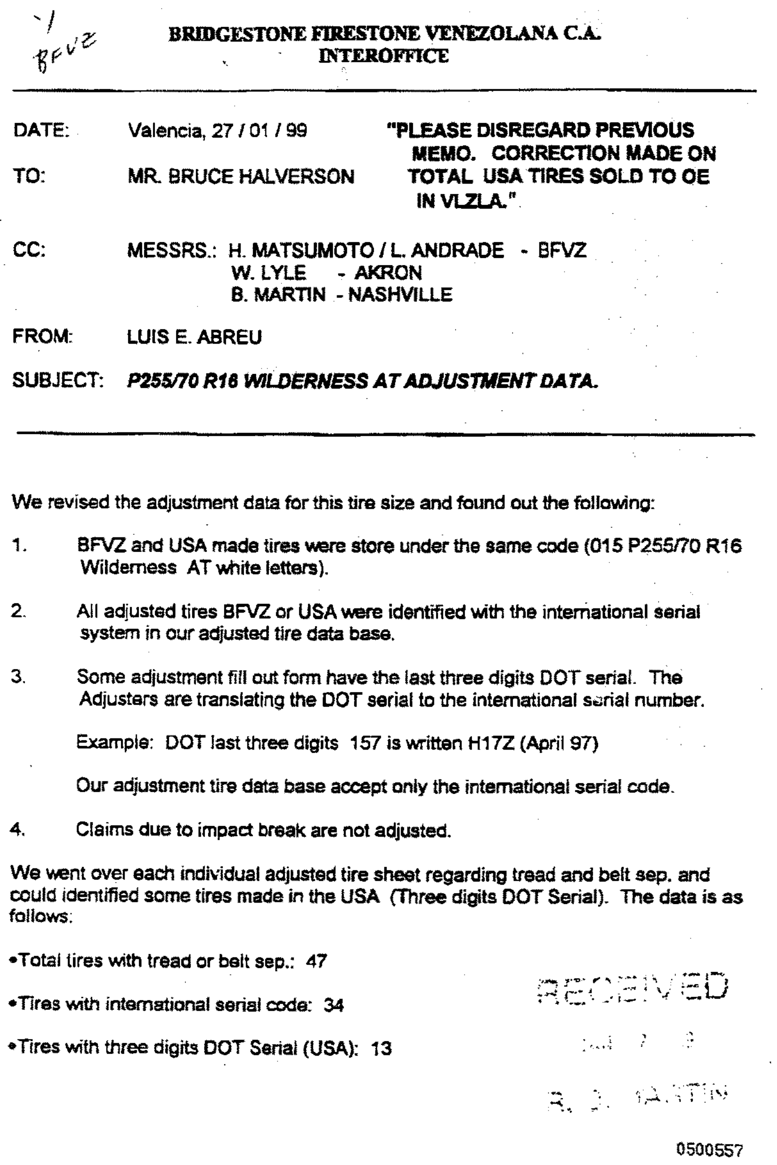
Please have in mind that tires with international serial code includes an unknown quantity of tires made in OE USA.

Please find attached the total adjustment data of this size.

If you have any other question, please do not hesitate to contact me.

Best regards,

L.E. Abreu



-/
BFVZ

BRIDGESTONE FIRESTONE VENEZOLANA C.A.
INTEROFFICE

DATE: Valencia, 27 / 01 / 99

TO: MR. BRUCE HALVERSON

"PLEASE DISREGARD PREVIOUS MEMO. CORRECTION MADE ON TOTAL USA TIRES SOLD TO OE IN VLZLA."

CC: MESSRS.: H. MATSUMOTO / L. ANDRADE - BFVZ
W. LYLE - AKRON
B. MARTIN - NASHVILLE

FROM: LUIS E. ABREU

SUBJECT: ***P255/70 R16 WILDERNESS AT ADJUSTMENT DATA.***

We revised the adjustment data for this tire size and found out the following:

1. BFVZ and USA made tires were store under the same code (015 P255/70 R16 Wilderness AT white letters).

2. All adjusted tires BFVZ or USA were identified with the international serial system in our adjusted tire data base.

3. Some adjustment fill out form have the last three digits DOT serial. The Adjusters are translating the DOT serial to the international serial number.

   Example: DOT last three digits 157 is written H17Z (April 97)

   Our adjustment tire data base accept only the international serial code.

4. Claims due to impact break are not adjusted.

We went over each individual adjusted tire sheet regarding tread and belt sep. and could identified some tires made in the USA (Three digits DOT Serial). The data is as follows:

•Total tires with tread or belt sep.: 47

•Tires with international serial code: 34

•Tires with three digits DOT Serial (USA): 13

RECEIVED
[illegible]
R. J. MARTIN

BY DEFFECTS	**SERIAL INTERNATIONAL**	**DOT**
CODE 235 BELT EDGE SEP.	19	8
CODE 136 BELT LEAVING BELT	12	3
CODE 137 BREAKER LEAVING CASING	2	0
CODE 135 TREAD LEAVING CASING	1	0
CODE 139 TREAD LEAVING BELT	0	1
CODE 230 SHOULDER SEP. BETWEEN RUBBER AND CASING	0	1
	34	13

•TOTAL TIRES SOLD BFVZ 69.456 (19.388 O.E.)
•TOTAL TIRES SOLD USA 58.041

Please have in mind that tires with international serial code includes an unknown quantity of tires made in OE USA.

Please find attached the total adjustment data of this size.

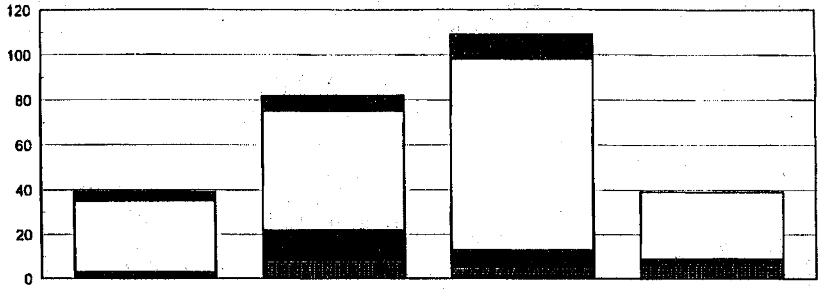
If you have any other question, please do not hesitate to contact me.

Best regards,

L.E. Abreu

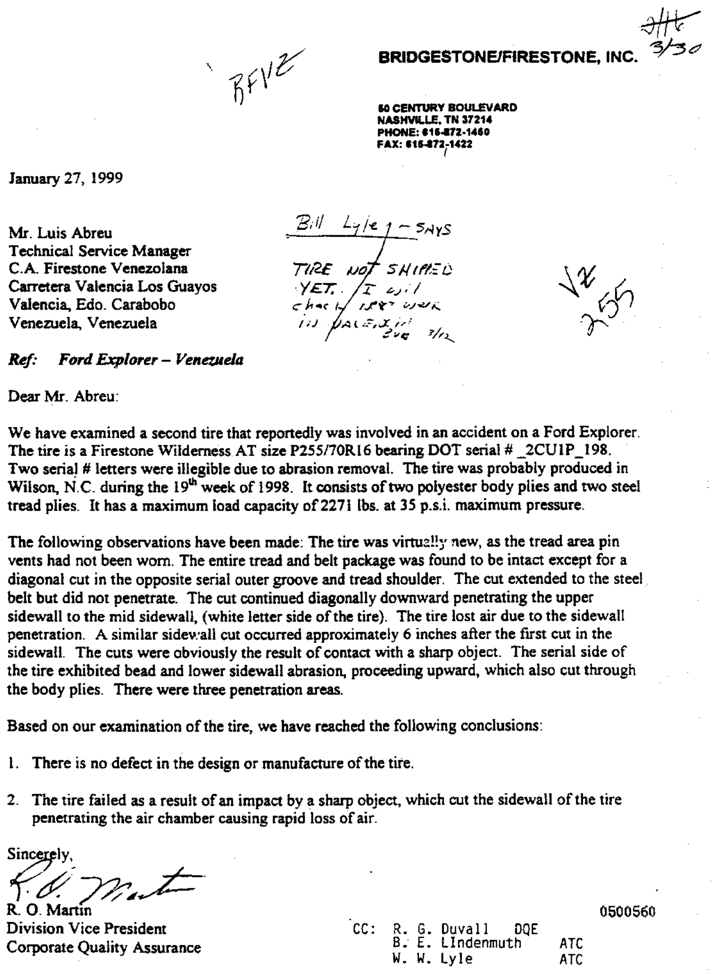
P255/70R-16 WILD. AT LB

MOST CRITICAL DEFECTS FROM JANUARY '95 TO DECEMBER '98



Failure	95	96	97	98
135 ■	0	0	1	0
136 ■	0	7	2	6
137 ▥	0	1	1	0
230 ▨	0	0	1	1
235 ■	3	14	8	2
702 □	32	53	85	30
Others ■	4	7	11	0
TOT.	39	82	109	39

135=Tread leaving casing
136=Belt leaving belt
137=Breaker leaving casing
230=Shoulder sep. between ruber and casing
235=Belt edge separation
702=Out of round



BFVZ

BRIDGESTONE/FIRESTONE, INC.

50 CENTURY BOULEVARD
NASHVILLE, TN 37214
PHONE: 615-872-1460
FAX: 615-872-1422

~~2/16~~
3/30

January 27, 1999

Mr. Luis Abreu
Technical Service Manager
C.A. Firestone Venezolana
Carretera Valencia Los Guayos
Valencia, Edo. Carabobo
Venezuela, Venezuela

Bill Lyle - SAYS
TIRE NOT SHIPPED
YET. I will
check next week
in [illegible]
3/12

V2
255

Ref: Ford Explorer – Venezuela

Dear Mr. Abreu:

We have examined a second tire that reportedly was involved in an accident on a Ford Explorer. The tire is a Firestone Wilderness AT size P255/70R16 bearing DOT serial # _2CU1P_198. Two serial # letters were illegible due to abrasion removal. The tire was probably produced in Wilson, N.C. during the 19th week of 1998. It consists of two polyester body plies and two steel tread plies. It has a maximum load capacity of 2271 lbs. at 35 p.s.i. maximum pressure.

The following observations have been made: The tire was virtually new, as the tread area pin vents had not been worn. The entire tread and belt package was found to be intact except for a diagonal cut in the opposite serial outer groove and tread shoulder. The cut extended to the steel belt but did not penetrate. The cut continued diagonally downward penetrating the upper sidewall to the mid sidewall, (white letter side of the tire). The tire lost air due to the sidewall penetration. A similar sidewall cut occurred approximately 6 inches after the first cut in the sidewall. The cuts were obviously the result of contact with a sharp object. The serial side of the tire exhibited bead and lower sidewall abrasion, proceeding upward, which also cut through the body plies. There were three penetration areas.

Based on our examination of the tire, we have reached the following conclusions:

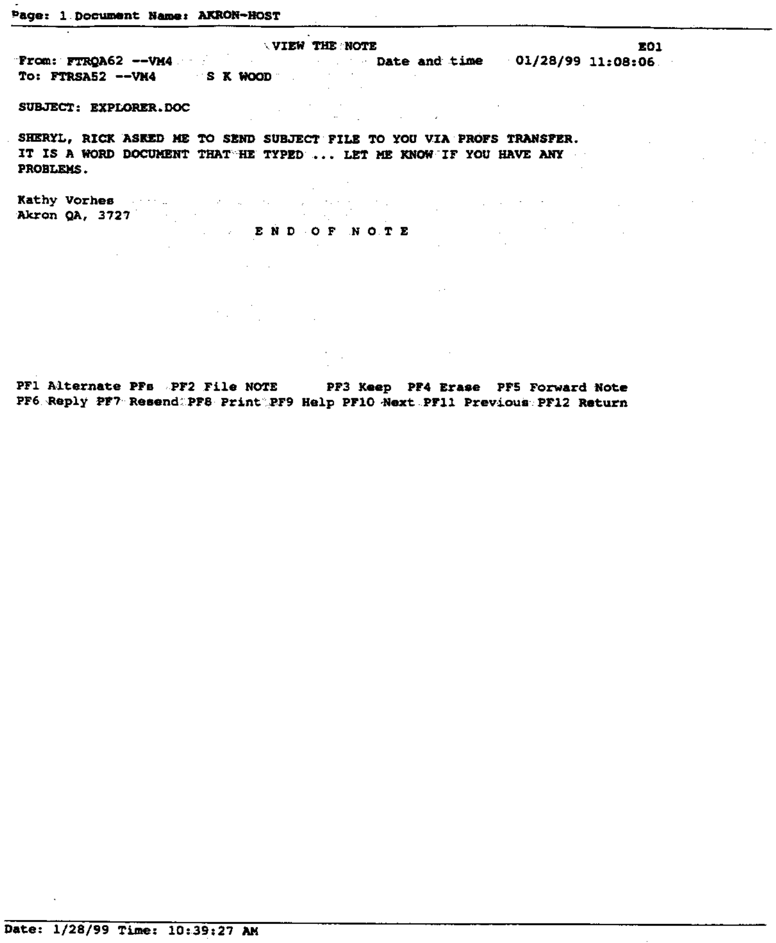
1. There is no defect in the design or manufacture of the tire.
2. The tire failed as a result of an impact by a sharp object, which cut the sidewall of the tire penetrating the air chamber causing rapid loss of air.

Sincerely,

R. O. Martin

R. O. Martin
Division Vice President
Corporate Quality Assurance

CC: R. G. Duvall DQE
B. E. Lindenmuth ATC
W. W. Lyle ATC



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Page: 1 Document Name: AKRON-HOST
                          VIEW THE NOTE                        E01
From: FTRQA62 --VM4                   Date and time   01/28/99 11:08:06
To: FTRSA52 --VM4       S K WOOD

SUBJECT: EXPLORER.DOC

SHERYL, RICK ASKED ME TO SEND SUBJECT FILE TO YOU VIA PROFS TRANSFER.
IT IS A WORD DOCUMENT THAT HE TYPED ... LET ME KNOW IF YOU HAVE ANY
PROBLEMS.

Kathy Vorhes
Akron QA, 3727
                    E N D  O F  N O T E




PF1 Alternate PFs  PF2 File NOTE      PF3 Keep  PF4 Erase  PF5 Forward Note
PF6 Reply PF7 Resend PF8 Print PF9 Help PF10 Next PF11 Previous PF12 Return

Date: 1/28/99 Time: 10:39:27 AM
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[illegible]

BRIDGESTONE/FIRESTONE, INC.
Akron Technology Company
1200 Firestone Parkway
Akron, OH 44317
PASS. & LTR TIRE DEVELOPMENT DIV.
FAX: 330-379-6563

FAX

TO: R O - MARTIN FROM: D - CANDIDO
FAX #: 1422 DATE: 5/5/99
SUBJ.: SPECIAL FORD DEVELOPMENT TESTS

TOTAL PAGES SENT ____

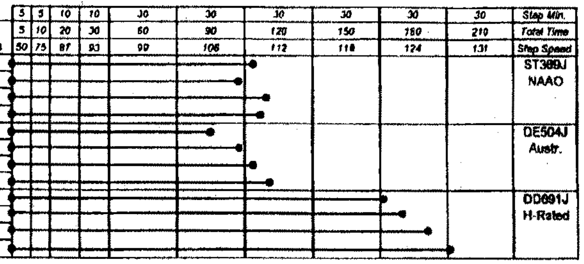
RECEIVING OPERATOR - PLEASE MAKE LOCAL FAX COPIES

Attached are the two tests Ford has asked us to run.

Comments?

Low Inflation / GAWR Load -- High Speed Testing (Round 1)

Test No.	Constr.	Infl. (psi)	Final Step Spd (mph)	Final Step Mins	Total Minutes
J38937	ST369J NAAO	20	112	4	94
J38938			106	27	87
J38939		25	112	11	101
J38940			112	7	97
J38941	DE504J Austr.	20	106	15	75
J38942			106	27	87
J38943		25	112	4	94
J38944			112	12	102
J38945	DD691J H-Rated	20	124	1	151
J38946			124	11	161
J38947		25	124	21	171
J38948			131	1	181



all tests: load = 1500 lbs

Failure Modes:

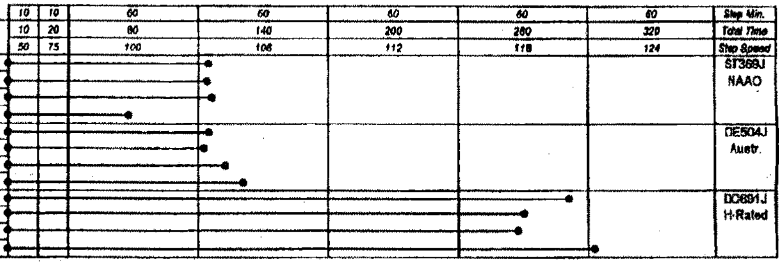
ST369J: Primary = Shoulder separation and/or chunk-out (less than 180°)
Secondary = SP2 edge separation

DE504J: Primary = Shoulder separation and/or chunk-out (less than 180°)
Secondary = none

DD691J: Primary = SW separation at IL/ABR splice (lower SW)
Secondary = SW flex break (at primary failure location)

Low Inflation / GAWR Load -- High Speed Testing (Round 2)

Test No.	Constr.	Final Step Spd (mph)	Final Step Mins	Total Minutes
J39134	ST369J NAAO	106	4	84
J39135		106	3	83
J39136		106	5	85
J39137		100	31	51
J39138	DE504J Austr.	106	4	84
J39139		106	2	82
J39140		106	15	95
J39141		106	23	103
J39142	DD691J H-Rated	118	52	252
J39143		118	36	238
J39144		118	33	233
J39145		124	4	264



all tests: load = 1500 lbs
all tests: infl. = 20 psi

Failure Modes:

ST369J: Primary = Shoulder separation and/or chunk-out (less than 180°)
Secondary = SP2 edge separation (1 tire)

DE504J: Primary = Shoulder separation and/or chunk-out (less than 180°)
Secondary = Cap ply / UT separation
Tertiary = SP2 edge separation (1 tire)

DD691J: Primary = SW separation at IL/ABR splice (lower SW)
Secondary = SW flex break (at primary failure location)

BRIDGESTONE/FIRESTONE, INC

Corporate Quality Assurance Division

50 Century Blvd.
Nashville, TN 37214
(PH) 615-872-1379
(FAX) 615-872-1422

Date: November 10, 1999

To: Mr. R.O. Martin

From: B.V. Halverson

Subject: VALENCIA ADJUSTED TIRE "MINI" SURVEY- OCTOBER 25-28

Valencia Technical Service collected about 200 tires that were submitted by SUV owners to Firestone dealers for adjustment.

Mr. J. Hoetzel and I went to Valencia the week of October 25 to analyze the tires. The tires all had a minimum of one cut through the tread and sidewall and the tires were inspected in the same way as in normal adjusted/worn tire surveys.

WILDERNESS AT TIRES

	P255/70R16 *	P235/70R16	LT245/75R16
CUSTOMER	EXPLORER/TOYOTA	EXPLORER	BLAZER
TOTAL TIRES INSPECTED	93	43	33
PRODUCING PLANT			
WILSON	60		
VALENCIA	28	43	33
JOLIETTE	5		
REMOVAL REASON			
% BES	36%	21%	54%
% BLB	20%	9%	24%
% OOR	30%	26%	12%
% NO REASON TO ADJUST	6%	35%	6%
% OTHER	9%	9%	3%
TOTAL REPAIRS	19	10	2

*The Ford Explorer uses the P255/70R16 RWL tire, the Toyota SUV uses the P255/70R16 BSW tire of which there were six tires in the 93 P255/70R16 size.

** There were actually more tires with repairs than shows in the report. Unfortunately the computer program did not save each entry that was made to indicate a repair was found in a tire. If multiple repairs were made, a note was made in the comments section, if only one repair was made, just the entry in the program was made and it was not always saved. The data in the table reflects tires that had multiple repairs or a single large repair that required a special comment. (the computer program has been corrected)

Based on the sample we inspected, the LT 245/75R16 adjusts at a higher rate for BES and BLB than the P255/70R16 and the P235/75R15.

ADDITIONAL COMMENTS

1. Four of the P255/70R16 adjusted for Out Of Round actually had a BES condition.
2. 5 tires had tread punctures as the primary removal code, three had tread punctures as a secondary removal code.

Our conclusion continues to be that service conditions in Venezuela related to tire maintenance and to speed are critical items in the performance of these tires in the Venezuela market.

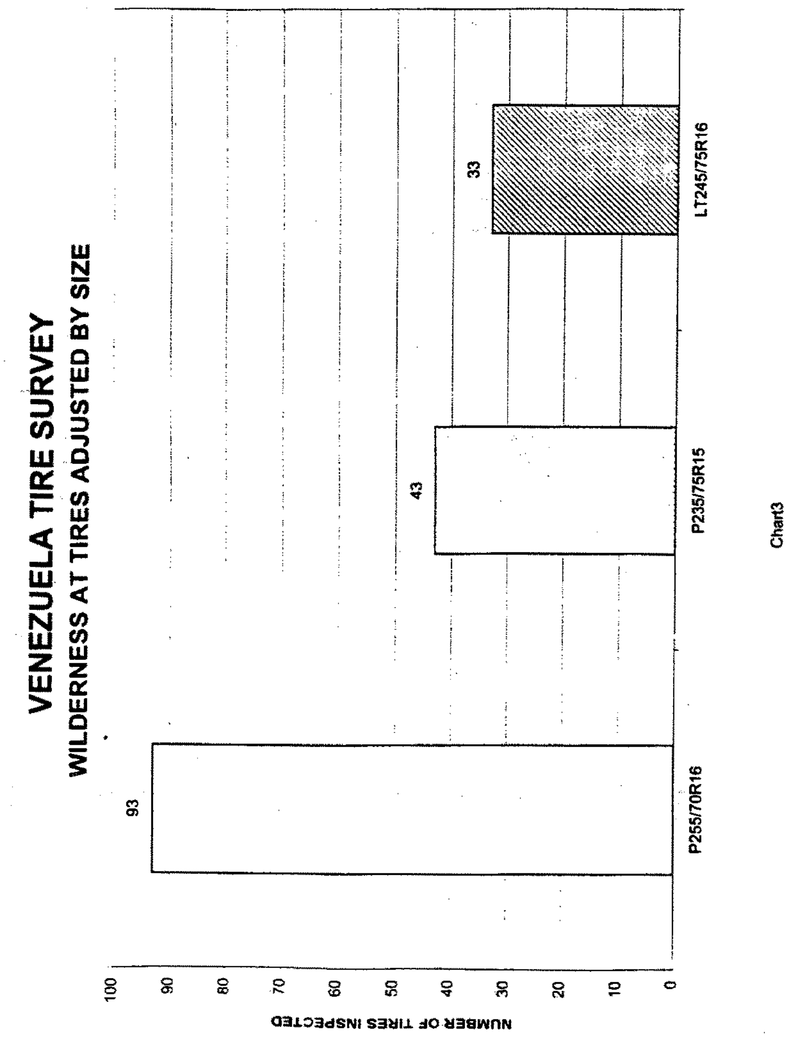
On the attached charts, there is an abbreviation for the adjustment condition, "no workmanship and materials found". On the Percent of Adjustments chart is says "no work" and on the Adjustment Vs repaired tires chart it says, "work".

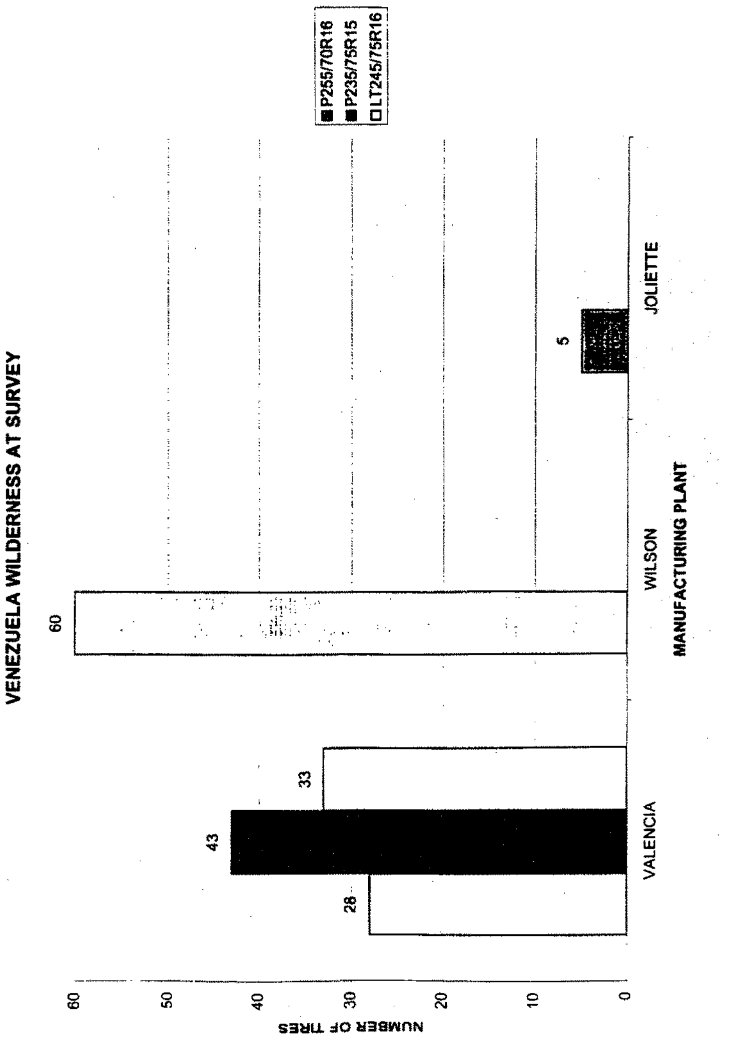
B.V. Halverson

B.V. Halverson
Mgr. Market Quality Engr.

CC: Mr. J. Gonzalez
Mr. L. Abreu
Mr. M. Suetsugu

RECEIVED
NOV 09 1999
R. O. MARTIN


VENEZUELA TIRE SURVEY
WILDERNESS AT TIRES ADJUSTED BY SIZE
NUMBER OF TIRES INSPECTED
0
10
20
30
40
50
60
70
80
90
100
93
43
33
P255/70R16
P235/75R15
LT245/75R16
Chart3


VENEZUELA WILDERNESS AT SURVEY
■ P255/70R16
■ P235/75R15
□ LT245/75R16
NUMBER OF TIRES
60
50
40
30
20
10
0
28
43
33
60
5
VALENCIA
WILSON
JOLIETTE
MANUFACTURING PLANT

VENEZUELA WILDERNESS AT SURVEY

PERCENT OF ADJUSTMENTS BY ADJUSTMENT REASON

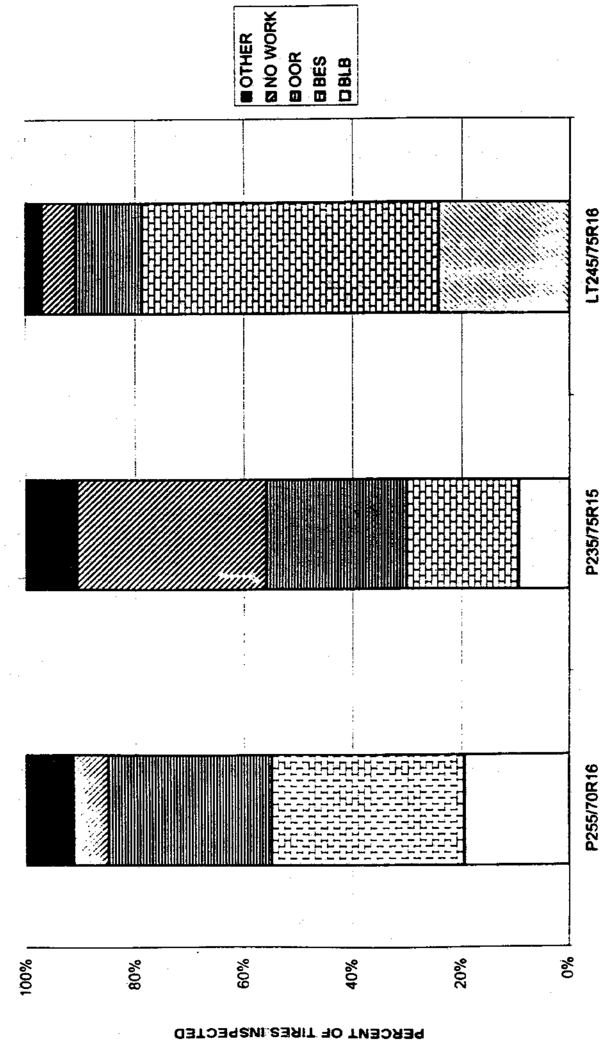


Chart5

VENEZUELA WILDERNESS AT ADJUSTMENT VS REPAIRED TIRES

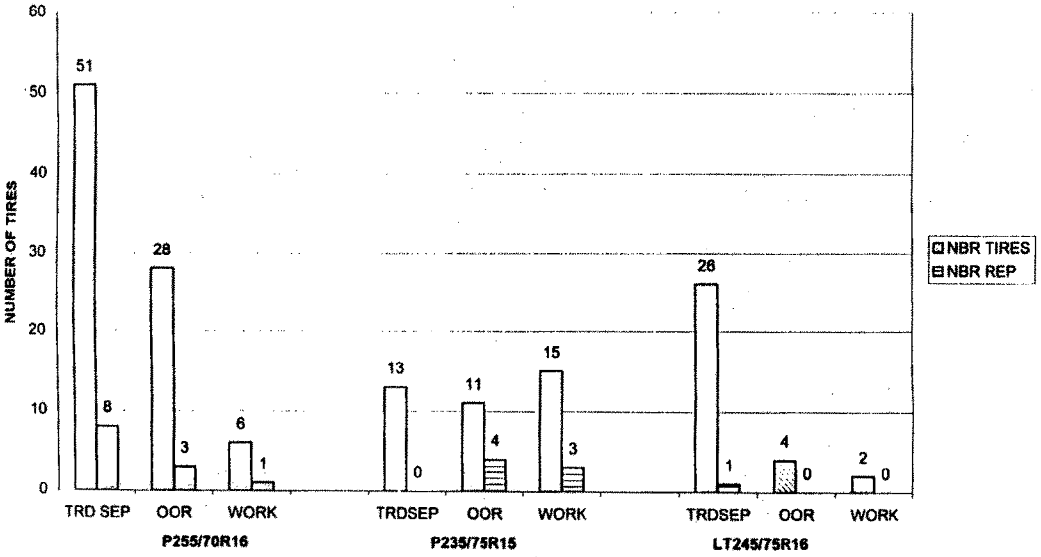
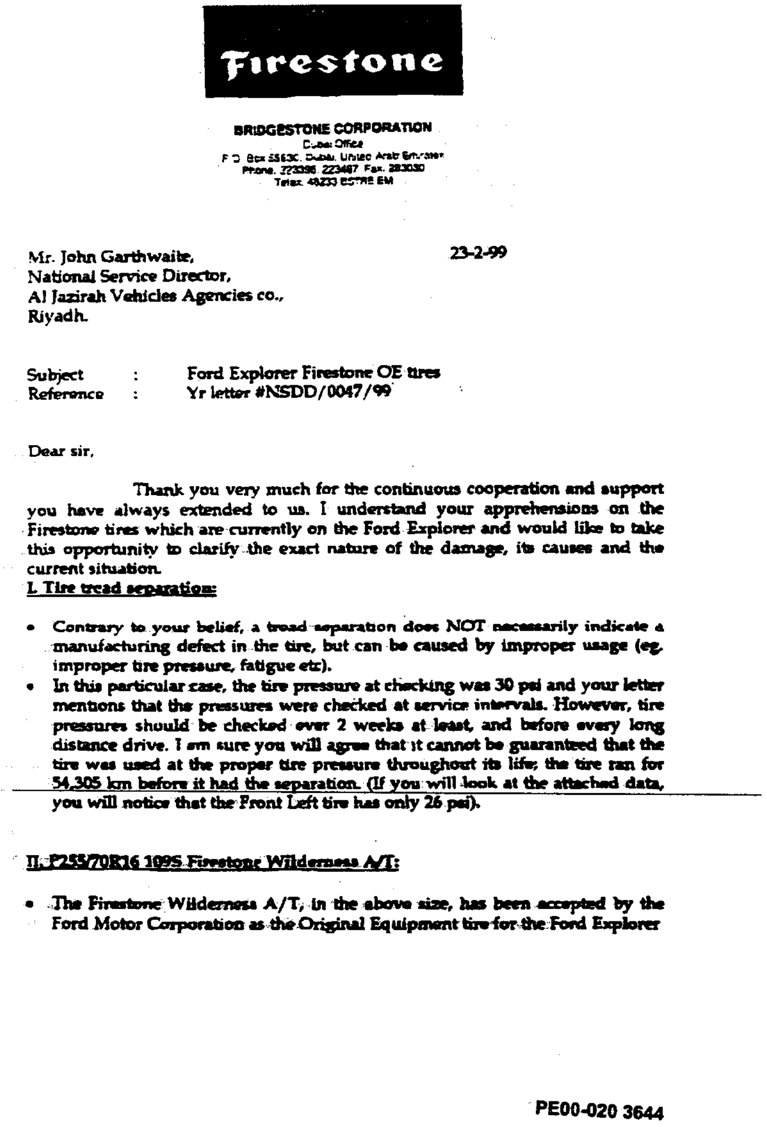


CHART 14



Firestone

BRIDGESTONE CORPORATION
Dubai Office
P.O. Box 55630, Dubai, United Arab Emirates
Phone. 223396. 223467 Fax. 283030
Telex. 48233 ESTRE EM

Mr. John Garthwaite,
National Service Director,
Al Jazirah Vehicles Agencies co.,
Riyadh.

23-2-99

Subject : Ford Explorer Firestone OE tires
Reference : Yr letter #NSDD/0047/99

Dear sir,

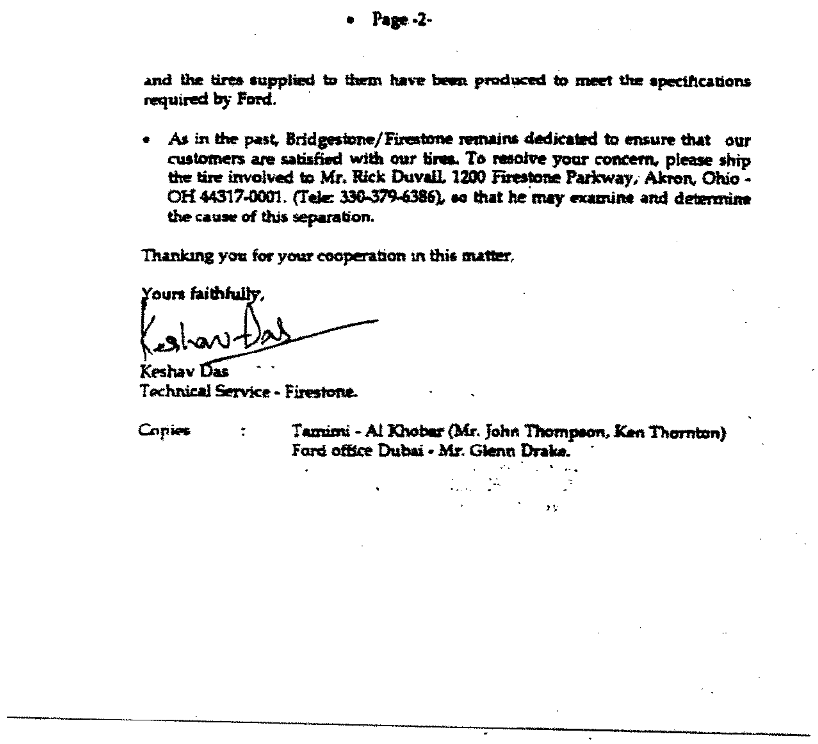
Thank you very much for the continuous cooperation and support you have always extended to us. I understand your apprehensions on the Firestone tires which are currently on the Ford Explorer and would like to take this opportunity to clarify the exact nature of the damage, its causes and the current situation.

I. Tire tread separation:

- Contrary to your belief, a tread separation does NOT necessarily indicate a manufacturing defect in the tire, but can be caused by improper usage (eg. improper tire pressure, fatigue etc).
- In this particular case, the tire pressure at checking was 30 psi and your letter mentions that the pressures were checked at service intervals. However, tire pressures should be checked over 2 weeks at least, and before every long distance drive. I am sure you will agree that it cannot be guaranteed that the tire was used at the proper tire pressure throughout its life; the tire ran for 54,305 km before it had the separation. (If you will look at the attached data, you will notice that the Front Left tire has only 26 psi).

II. P255/70R16 109S Firestone Wilderness A/T:

- The Firestone Wilderness A/T, in the above size, has been accepted by the Ford Motor Corporation as the Original Equipment tire for the Ford Explorer



• Page -2-

and the tires supplied to them have been produced to meet the specifications required by Ford.

- As in the past, Bridgestone/Firestone remains dedicated to ensure that our customers are satisfied with our tires. To resolve your concern, please ship the tire involved to Mr. Rick Duvall, 1200 Firestone Parkway, Akron, Ohio - OH 44317-0001. (Tele: 330-379-6386), so that he may examine and determine the cause of this separation.

Thanking you for your cooperation in this matter,

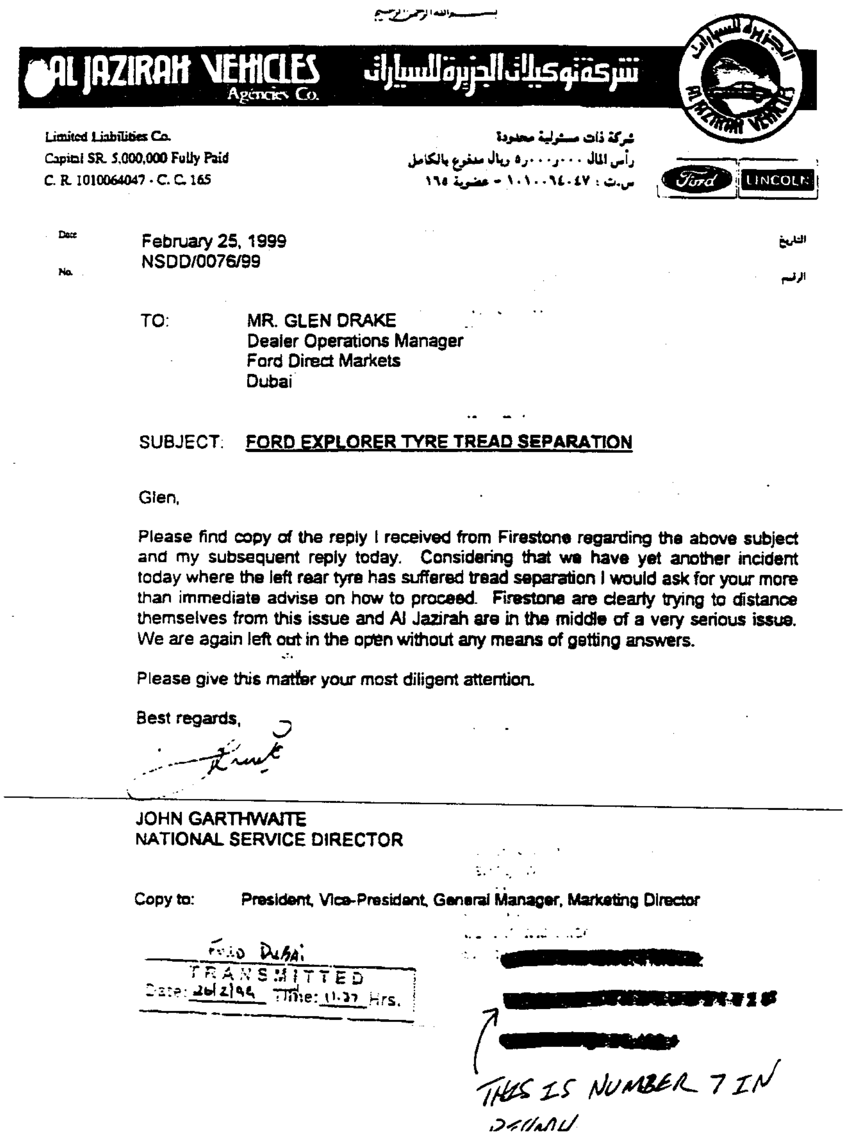
Yours faithfully,
Keshav Das
Keshav Das
Technical Service - Firestone.

Copies : Tamimi - Al Khobar (Mr. John Thompson, Ken Thornton)
Ford office Dubai - Mr. Glenn Drake.

Details of checked data:

Vehicle : Ford Explorer
Type : Stn. Wagon
Run km : 54,305
Tire size : P255/70R16 1095
Pattern : Firestone Wilderness A/T
Type : Tubeless

Position	DOT serial	RTD(mm)	Pressure
Front Left	W2CU1PX096	9.2	26 psi
Front Right	W2CU1PX096	9.2	31 psi
Rear Left	W2CU1PX096	9.4	32 psi
Rear Right	W2CU1PX096 damaged tire	9.4	30 psi



بسم الله الرحمن الرحيم

AL JAZIRAH VEHICLES
Agencies Co.

شركة توكيلات الجزيرة للسيارات

Limited Liabilities Co.
Capital SR. 5,000,000 Fully Paid
C. R. 1010064047 - C. C. 165

شركة ذات مسئولية محدودة
رأس المال ٠٠٠ر٠٠٠ر٥ ريال مدفوع بالكامل
س.ت : ١٠١٠٠٦٤٠٤٧ - عضوية ١٦٥

Ford LINCOLN

Date February 25, 1999 التاريخ
No. NSDD/0076/99 الرقم

TO: MR. GLEN DRAKE
Dealer Operations Manager
Ford Direct Markets
Dubai

SUBJECT: **FORD EXPLORER TYRE TREAD SEPARATION**

Glen,

Please find copy of the reply I received from Firestone regarding the above subject and my subsequent reply today. Considering that we have yet another incident today where the left rear tyre has suffered tread separation I would ask for your more than immediate advise on how to proceed. Firestone are clearly trying to distance themselves from this issue and Al Jazirah are in the middle of a very serious issue. We are again left out in the open without any means of getting answers.

Please give this matter your most diligent attention.

Best regards,

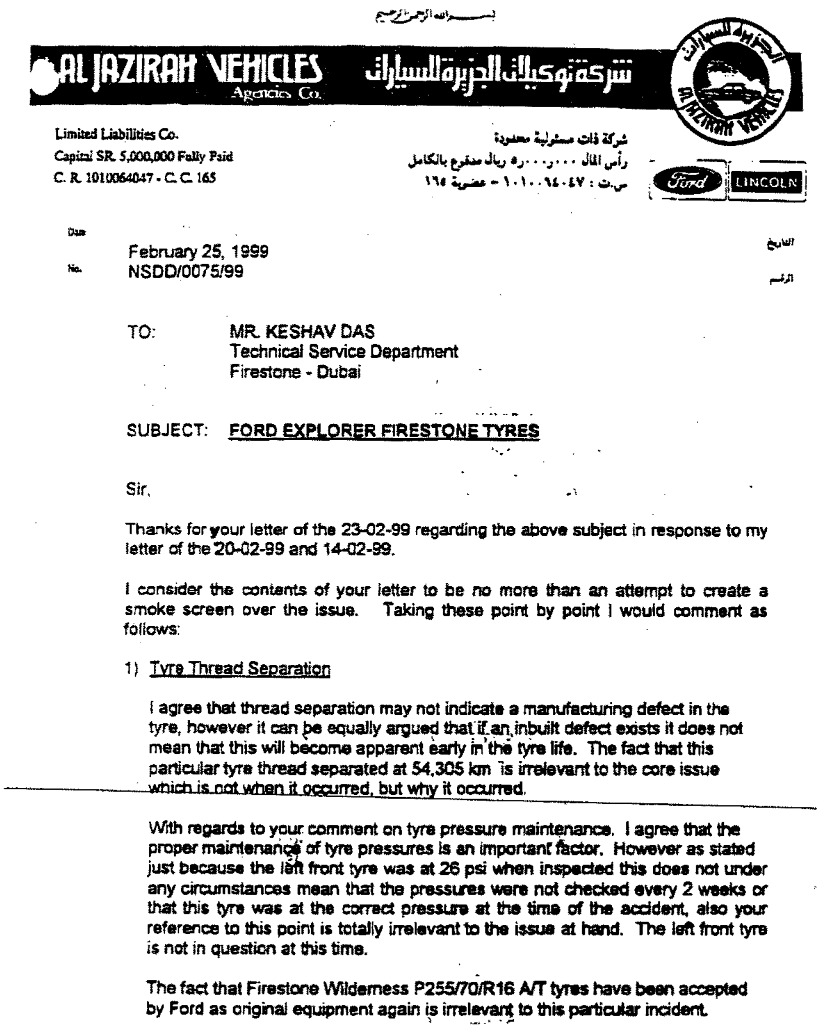
JOHN GARTHWAITE
NATIONAL SERVICE DIRECTOR

Copy to: President, Vice-President, General Manager, Marketing Director

Fdo Dubai
TRANSMITTED
Date: 26/2/99 Time: 11.37 Hrs.

[redacted]

THIS IS NUMBER 7 IN
[illegible]



بسم الله الرحمن الرحيم

AL JAZIRAH VEHICLES Agencies Co.
شركة توكيلات الجزيرة للسيارات

Limited Liabilities Co.
Capital SR. 5,000,000 Fully Paid
C. R. 1010064047 - C. C. 165

شركة ذات مسئولية محدودة
رأس المال ٥٠٠٠٠٠٠ ريال مدفوع بالكامل
س.ت : ١٠١٠٠٦٤٠٤٧ - عضوية ١٦٥

Ford LINCOLN

Date February 25, 1999 التاريخ
No. NSDD/0075/99 الرقم

TO: MR. KESHAV DAS
Technical Service Department
Firestone - Dubai

SUBJECT: FORD EXPLORER FIRESTONE TYRES

Sir,

Thanks for your letter of the 23-02-99 regarding the above subject in response to my letter of the 20-02-99 and 14-02-99.

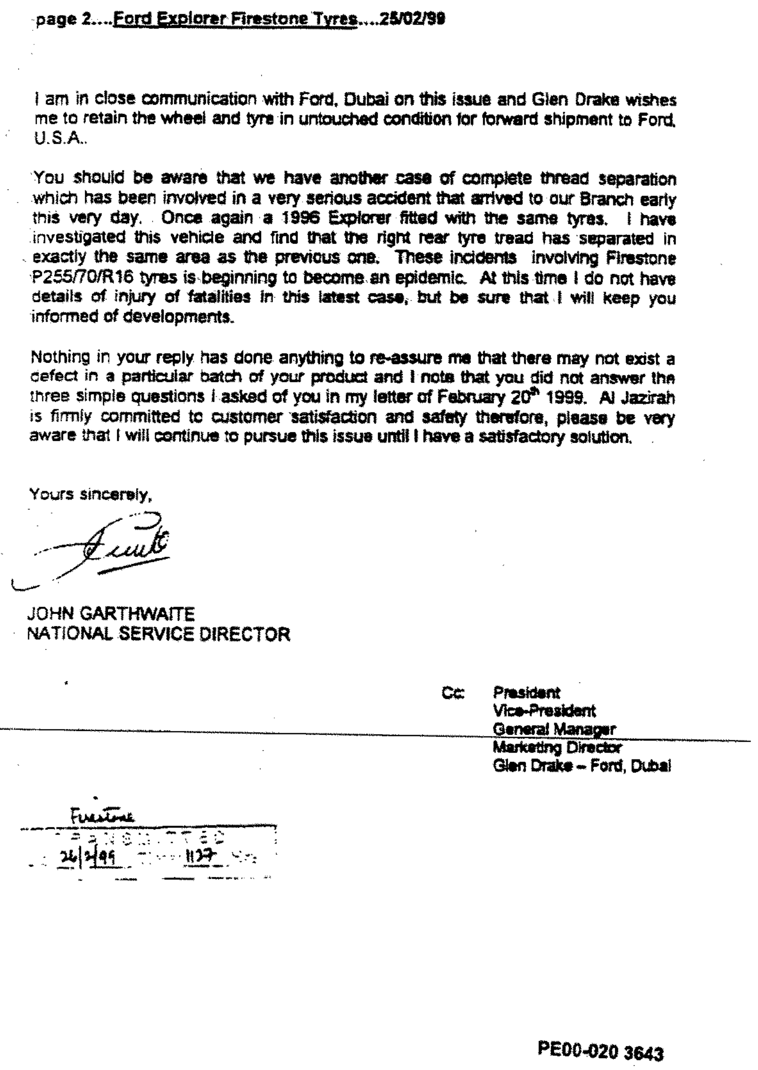
I consider the contents of your letter to be no more than an attempt to create a smoke screen over the issue. Taking these point by point I would comment as follows:

1) Tyre Thread Separation

I agree that thread separation may not indicate a manufacturing defect in the tyre, however it can be equally argued that if an inbuilt defect exists it does not mean that this will become apparent early in the tyre life. The fact that this particular tyre thread separated at 54,305 km is irrelevant to the core issue which is not when it occurred, but why it occurred.

With regards to your comment on tyre pressure maintenance. I agree that the proper maintenance of tyre pressures is an important factor. However as stated just because the left front tyre was at 26 psi when inspected this does not under any circumstances mean that the pressures were not checked every 2 weeks or that this tyre was at the correct pressure at the time of the accident, also your reference to this point is totally irrelevant to the issue at hand. The left front tyre is not in question at this time.

The fact that Firestone Wilderness P255/70/R16 A/T tyres have been accepted by Ford as original equipment again is irrelevant to this particular incident.



page 2....Ford Explorer Firestone Tyres....25/02/99

I am in close communication with Ford, Dubai on this issue and Glen Drake wishes me to retain the wheel and tyre in untouched condition for forward shipment to Ford, U.S.A..

You should be aware that we have another case of complete thread separation which has been involved in a very serious accident that arrived to our Branch early this very day. Once again a 1996 Explorer fitted with the same tyres. I have investigated this vehicle and find that the right rear tyre tread has separated in exactly the same area as the previous one. These incidents involving Firestone P255/70/R16 tyres is beginning to become an epidemic. At this time I do not have details of injury of fatalities in this latest case, but be sure that I will keep you informed of developments.

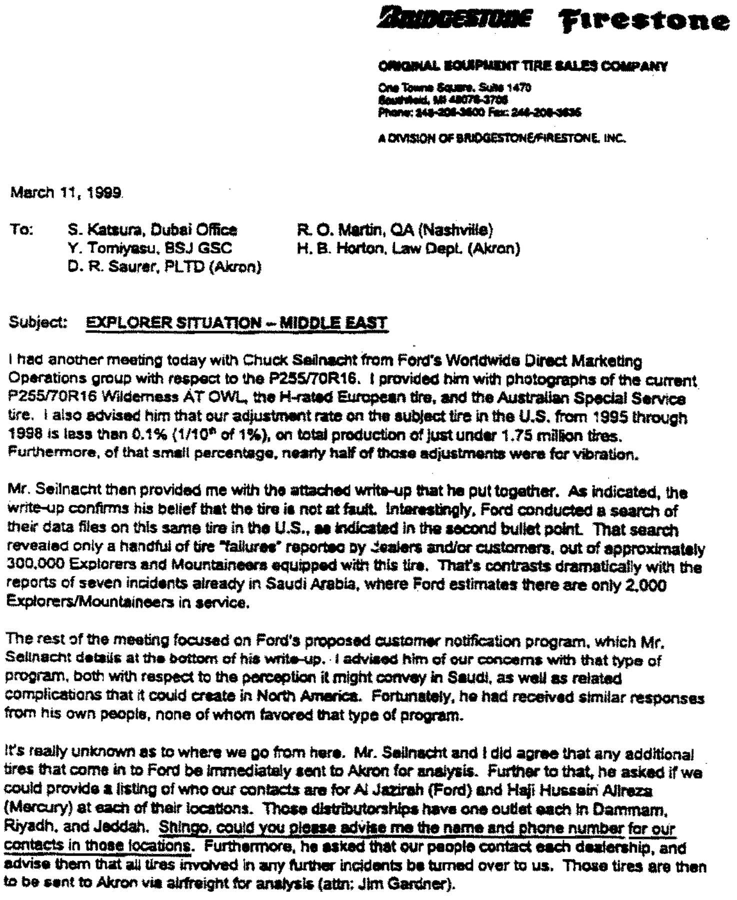
Nothing in your reply has done anything to re-assure me that there may not exist a defect in a particular batch of your product and I note that you did not answer the three simple questions I asked of you in my letter of February 20th 1999. Al Jazirah is firmly committed to customer satisfaction and safety therefore, please be very aware that I will continue to pursue this issue until I have a satisfactory solution.

Yours sincerely,

JOHN GARTHWAITE
NATIONAL SERVICE DIRECTOR

Cc: President
Vice-President
General Manager
Marketing Director
Glen Drake – Ford, Dubai

Firestone
TRANSMITTED
26/2/99 1127



BRIDGESTONE Firestone

ORIGINAL EQUIPMENT TIRE SALES COMPANY

One Towne Square, Suite 1470
Southfield, MI 48076-3706
Phone: 248-208-3600 Fax: 248-208-3636

A DIVISION OF BRIDGESTONE/FIRESTONE, INC.

March 11, 1999

To: S. Katsura, Dubai Office
Y. Tomiyasu, BSJ GSC
D. R. Saurer, PLTD (Akron)
R. O. Martin, QA (Nashville)
H. B. Horton, Law Dept. (Akron)

Subject: **EXPLORER SITUATION – MIDDLE EAST**

I had another meeting today with Chuck Seilnacht from Ford's Worldwide Direct Marketing Operations group with respect to the P255/70R16. I provided him with photographs of the current P255/70R16 Wilderness AT OWL, the H-rated European tire, and the Australian Special Service tire. I also advised him that our adjustment rate on the subject tire in the U.S. from 1995 through 1998 is less than 0.1% (1/10th of 1%), on total production of just under 1.75 million tires. Furthermore, of that small percentage, nearly half of those adjustments were for vibration.

Mr. Seilnacht then provided me with the attached write-up that he put together. As indicated, the write-up confirms his belief that the tire is not at fault. Interestingly, Ford conducted a search of their data files on this same tire in the U.S., as indicated in the second bullet point. That search revealed only a handful of tire "failures" reported by dealers and/or customers, out of approximately 300,000 Explorers and Mountaineers equipped with this tire. That's contrasts dramatically with the reports of seven incidents already in Saudi Arabia, where Ford estimates there are only 2,000 Explorers/Mountaineers in service.

The rest of the meeting focused on Ford's proposed customer notification program, which Mr. Seilnacht details at the bottom of his write-up. I advised him of our concerns with that type of program, both with respect to the perception it might convey in Saudi, as well as related complications that it could create in North America. Fortunately, he had received similar responses from his own people, none of whom favored that type of program.

It's really unknown as to where we go from here. Mr. Seilnacht and I did agree that any additional tires that come in to Ford be immediately sent to Akron for analysis. Further to that, he asked if we could provide a listing of who our contacts are for Al Jazirah (Ford) and Haji Hussein Alireza (Mercury) at each of their locations. Those distributorships have one outlet each in Dammam, Riyadh, and Jeddah. Shingo, could you please advise me the name and phone number for our contacts in those locations. Furthermore, he asked that our people contact each dealership, and advise them that all tires involved in any further incidents be turned over to us. Those tires are then to be sent to Akron via airfreight for analysis (attn: Jim Gardner).

Ford plans to proceed with the change to the H-rated European tire for newly built Explorers destined for the Middle East, as soon as possible. Unfortunately, there is still concern that if punctures, and run-low conditions, are the ultimate cause of the concern, as is suspected, neither this tire, nor the Special Service tire, will totally resolve the situation. I further advised Mr. Selinacht that we are working with the Ford U152 people (2002 Explorer) on a ROW (rest-of-world) tire that would be a compromise of attributes (chip tear, puncture resistance, high speed/heat resistance, etc.) for Explorers going to various parts of the world, including the Middle East. While he commends those efforts, he further recognizes that this will not provide any immediate help.

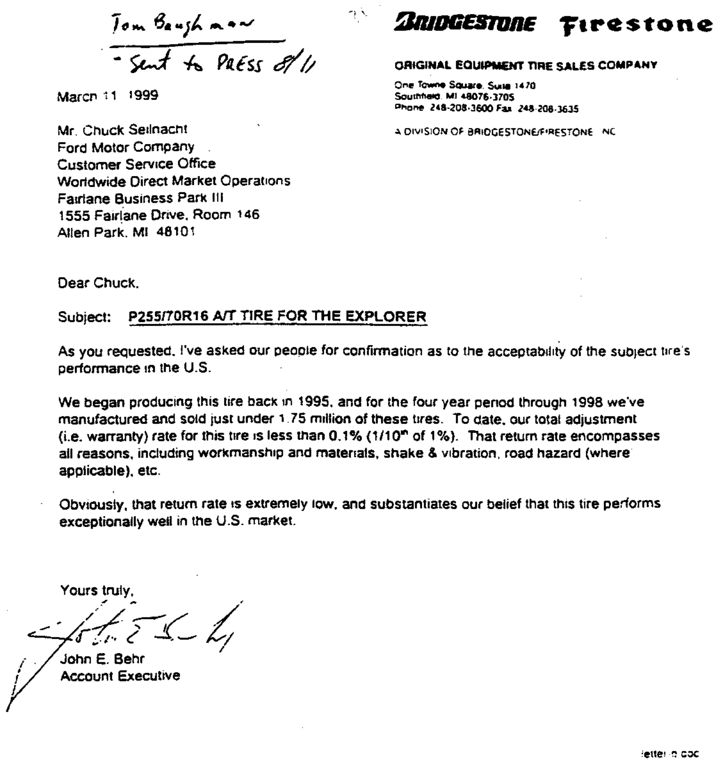
Lastly, with respect to GSC's question on changing to a white letter tire, it is generally felt that the H-rated tire is the best alternative at this time. The rest-of-world tire being proposed to Ford will be white letter, but until (and if) that tire is approved, Ford is proceeding with the change to the BSW H-rated tire for the Middle East.

Yours truly,

John E. Behr
Account Executive

cc: A. W. Stuart J. Saruwatari (BSJ GSC)
J. Ujiyama / P. Hoda D. Candido (ATC)

letter-c.doc



Tom Baughman

- Sent to PRESS 8/11

BRIDGESTONE Firestone

ORIGINAL EQUIPMENT TIRE SALES COMPANY

One Towne Square, Suite 1470
Southfield, MI 48076-3705
Phone 248-208-3600 Fax 248-208-3635

A DIVISION OF BRIDGESTONE/FIRESTONE INC

March 11 1999

Mr. Chuck Seilnacht
Ford Motor Company
Customer Service Office
Worldwide Direct Market Operations
Fairlane Business Park III
1555 Fairlane Drive, Room 146
Allen Park, MI 48101

Dear Chuck,

Subject: P255/70R16 A/T TIRE FOR THE EXPLORER

As you requested, I've asked our people for confirmation as to the acceptability of the subject tire's performance in the U.S.

We began producing this tire back in 1995, and for the four year period through 1998 we've manufactured and sold just under 1.75 million of these tires. To date, our total adjustment (i.e. warranty) rate for this tire is less than 0.1% (1/10th of 1%). That return rate encompasses all reasons, including workmanship and materials, shake & vibration, road hazard (where applicable), etc.

Obviously, that return rate is extremely low, and substantiates our belief that this tire performs exceptionally well in the U.S. market.

Yours truly,

John E. Behr
Account Executive

letter n.doc

MIDDLE EAST TIRE SURVEY: Ford Explorer / P255/70R16 109S Firestone Wilderness AT

Presentation Subject:	Middle East Tire Survey / Trip Summary and Report
Presentation Agenda:	Ford/Firestone Survey Team and Itinerary Overview of Inspection Data with General Observations Examples of Tire Problems/Risks Found Summary Conclusion and Recommendations
Desired Presentation Outcome:	Cause of Tire Problems Understanding of Mid East Market Requirements for SUV Tires

MIDDLE EAST TIRE SURVEY: Ford Explorer / P255/70R16 109S Firestone Wilderness AT

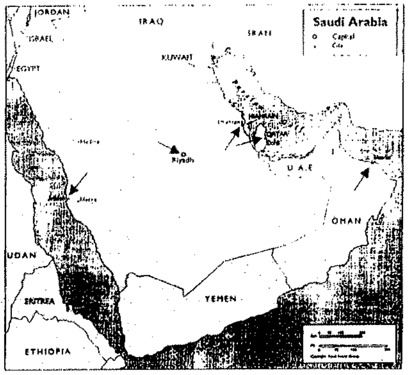
TRIP SUMMARY AND REPORT

Team: Ford: Jim Johnson, Technical Service Manager, WDMO, Dearborn
Amir Al Oraibi, Field Service Manager, MidEast/Africa, Dubai

BFS: Bruce Halverson, Manager, Market Quality Assurance, Nashville
Brian Queiser, Proj. Engineer, OE Pass/LT Development, Akron

Itinerary:

June	Location	Dealer/Contact	Veh.
9	Jeddah, Saudi	Al Jazirah	11
10	Jeddah, Saudi	Haji Husein Alireza	7
11	Travel		
12	Riyadh, Saudi	Al Jazirah Auto World	12
13	Riyadh, Saudi	Haji Husein Alireza	7
14	Al Khobar, Saudi	Al Jazirah	4
15	Al Khobar, Saudi	Tamimi Co. Haji Husein Alireza	7
16	Doha, Qatar	Almana Motors	6
17	Muscat, Oman	Arabian Car Mktg	13
		total:	67



0500043

MIDDLE EAST TIRE SURVEY: Ford Explorer / P255/70R16 109S Firestone Wilderness AT

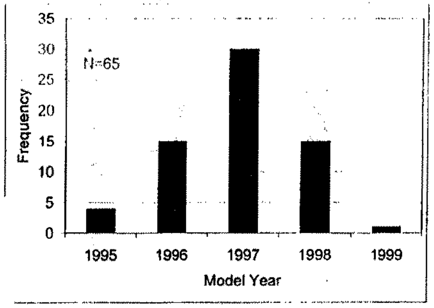
Overview of Inspections:

➢ Total Vehicles and Tires:

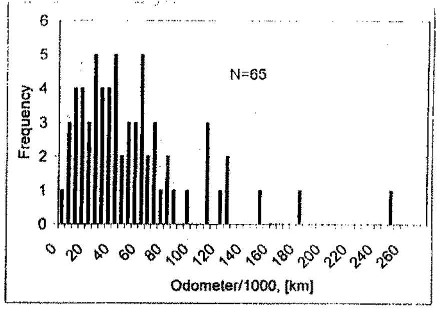
- (67) Explorers [VIN, odometer]
- ≈ (268) tires [DOT, groove depth, inflation, chip/tear rating, repairs, cuts/punctures]

➢ All vehicles, except new, at the visited dealers were checked (most were in for repair/maintenance)

Model Year Histogram:



Odometer Histogram:

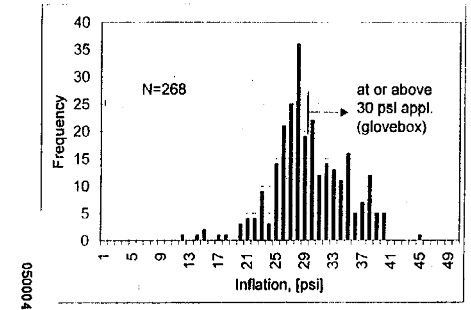


Overview of Inspections (continued):

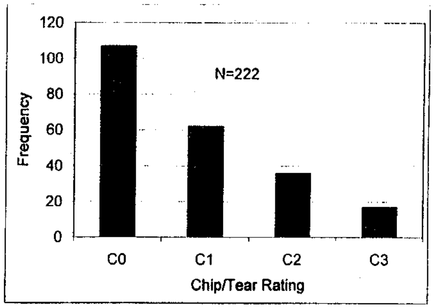
➢ Tire inflation recorded for all tires (including non-Firestone) on every Explorer examined.
- 54% of tires below 30 psi (Ford recommended inflation setting = 30/30 psi F/R)
- (9) tires at or below 20 psi

➢ Chip/Tear ratings only for Firestone brand tires (new tires excluded)
- ~25% of tires exhibited moderate to heavy chip/tear

Tire Inflation Histogram:



Chip/Tear Rating Histogram:



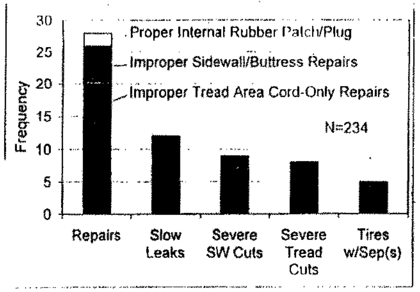
C0 = little or no chip/tear evident
C1 = chip/tear evident to engineer (light)
C2 = chip/tear evident to consumer (moderate)
C3 = chip/tear objectionable to consumer (heavy)

MIDDLE EAST TIRE SURVEY: Ford Explorer / P255/70R16 109S Firestone Wilderness AT

Overview of Inspections (continued):

- ➢ Individual repairs, leaks, cuts, etc. data recorded for only Firestone brand tires
  - Improper repairs found in ~11% of Firestone tires inspected
    - (6) Improper sidewall/buttress repairs
    - (20) Improper cord-only repairs in tread area
  - Slow leaks, causing a run-low condition, can result in internal tire damage
  - Severe cuts can be indicators of additional damage
  - Firestone North American policy: improperly repaired tires are not warranted and any repair/damage nullifies the tire speed rating
- ➢ During the tire survey, all cases of safety concerns were reported to the dealership service manager

Tire Anomalies Histogram:



Overview of Inspections (continued):

➢ Other General Observations

- Service Conditions:
  - Highway tarmac conditions are very good; often 6+ lanes with high speed capability.
  - City streets are similar configuration to NA/Europe, except more roundabouts
  - Speed is virtually unrestrained in all areas
  - Driving habits are aggressive; testimonials indicate max vehicle speed regularly attained on highway
  - Testimonials indicate off-road use is common. Reducing tire inflation to operate in soft sand and heavy rock is usual practice—increasing before returning to highway is not 100%.
  - Sustained summer heat is very high, well over 105°F during day—hotter inland
- Vehicles:
  - Many vehicles exhibited witness marks of moderate off-road use (front and rear wheel housing shroud damage/scrapes, rocker damage, etc.); some more than others
  - Many vehicles equipped with 3rd row seats—fully loaded with passengers, Explorers are near GVW
- Tires/Wheels:
  - **Projected avg wearout (based on this survey) of the OE tires is ~139,000 km (86,000 mi)**
  - **Roughly 50% or more wheels were missing valve caps (potential leakage)**
  - **Upper sidewall and shoulder area rubber cracking was more common on tires in the eastern, Persian Gulf cities**
  - **Tire anomalies appeared worse and more often on the outboard side (direct sun, ozone)**

Examples of Increased Risk:

- 1996MY found to have one tire at 28 psi, others ~35 psi. Low tire found to have tread cuts and separation due to undetermined slow leak (run-low damage)
- 1998MY found to have one tire at 14 psi, others ~26 psi. Low tire slow leaking due to nail.
- 1998MY found to have one tire with nail and slow leak. All tires had been recently set to ~33 psi by shop technician.
- 1997MY with four very badly worn and multiple-repaired tires. Steel belts exposed on one tire. One tire with shoulder cord repair. All tires ~20 psi.
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- 1997MY found to have one tire at 12 psi, others ~30 psi. Low tire slow leaking due to nail.
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MIDDLE EAST TIRE SURVEY: **Ford Explorer / P255/70R16 109S Firestone Wilderness AT**

Summary:

- ➢ The Middle East presents extreme service conditions for tires:
  - Heat
  - Speed
  - Braking
  - Off-Road / Rough-Road (esp. for SUV)
- ➢ Low inflation operating situations--causing damage aggravated/accelerated by the Mid East service conditions--such as:
  - Unintentional under-inflation condition (puncture, other leaks)
  - Improper repair (can cause further damage)
  - Continued/Repeated use while under-inflated (i.e. after off-road usage)
  - Poor tire maintenance
- ➢ Long-term exposure to the Mid East service conditions due to high projected wearout mileage

MIDDLE EAST TIRE SURVEY: Ford Explorer / P255/70R16 109S Firestone Wilderness AT

Conclusion:

- ➢ Mid East service conditions are not addressed with current OE tire designed for North America.
  - NA emphasis on weight, rolling resistance, ride, snow handling, wet handling

Recommendations:

- ➢ Explorer Short-Term Performance Improvement:
  - Current and 2000MY Explorers in the Mid East should be fitted with Firestone P255/70R16 109S Wilderness AT Special Service tires, originally developed for 1998 Explorer export to Australia

- ➢ Explorer Long-Term Performance Improvement:
  - 2001MY Explorer, U152, should specify a so-called 'rest-of-world' tire
    - Export to various world markets, incl. Australia and Mid East
    - Performance Features of the current Special Service tire
    - Higher speed rating (at least T-rating)
    - Currently in development

- ➢ Other Ford SUV:
  - **Expedition should specify same Special Service and rest-of-world tire or similar**
  - **Other platforms under review (Excursion, SA Ranger, and U204/J14)**

- ➢ Enhancement of ES and DVP&R criteria

Firestone Tire Meeting

July 7, 1999

Location: [illegible] conference room F

Facilitator: Mike [illegible]

Agenda

1:00 – 1:10 Introductions

1:10 – 1:40 Review trip report findings Brian Queiser, Bridgestone / Firestone

1:40 – 2:[illegible] Special Service / Australian tire availability and timing, Bridgestone / Firestone

2:[illegible] Conclusion of Firestone portion of the meeting. Ford employees remain until 3:00

MIDDLE EAST TIRE SURVEY: Ford Explorer / P255/70R16 109S Firestone Wilderness AT

Presentation Subject: Middle East Tire Survey / Trip Summary and Report

Presentation Agenda:
Ford/Firestone Survey Team and Itinerary
Overview of Inspection Data with General Observations
Examples of Tire Problems/Risks Found
Summary
Conclusion and Recommendations

Desired Presentation Outcome:
Cause of Tire Problems
Understanding of Mid East Market Requirements for SUV Tires

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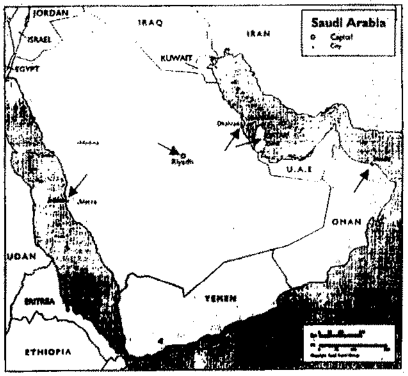

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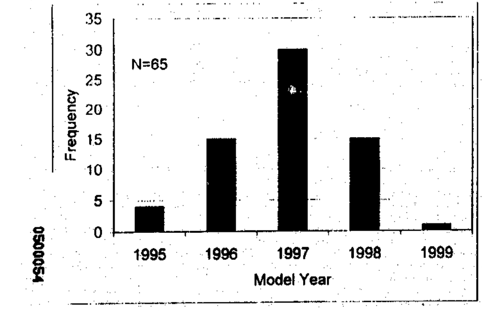

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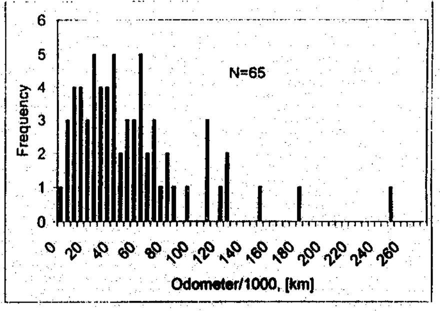

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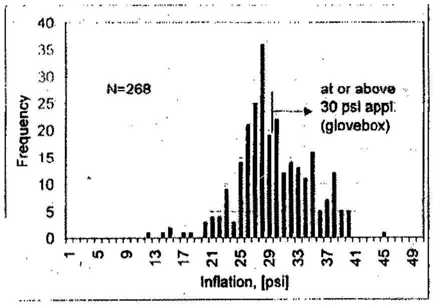

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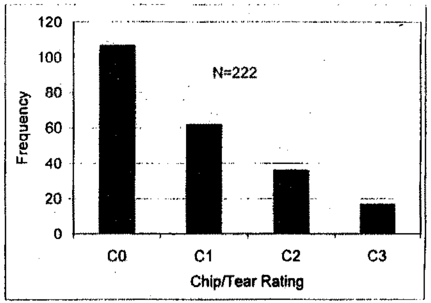

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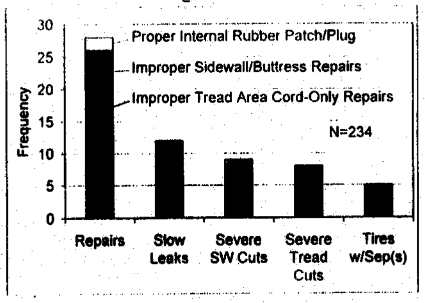

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- ➢ Enhancement of ES and DVP&R criteria

X Sandi Avalon

Martin, Bob

From: Queiser, Brian
Sent: Tuesday, July 27, 1999 12:43 PM
To: Saurer, Dan
Cc: Behr, John; Candido, Dennis; Stuart, Art; Johnson, Bob; Martin, Bob; Freund, Bill
Subject: Tire Data / Re: CEO Mtg 7-27-99

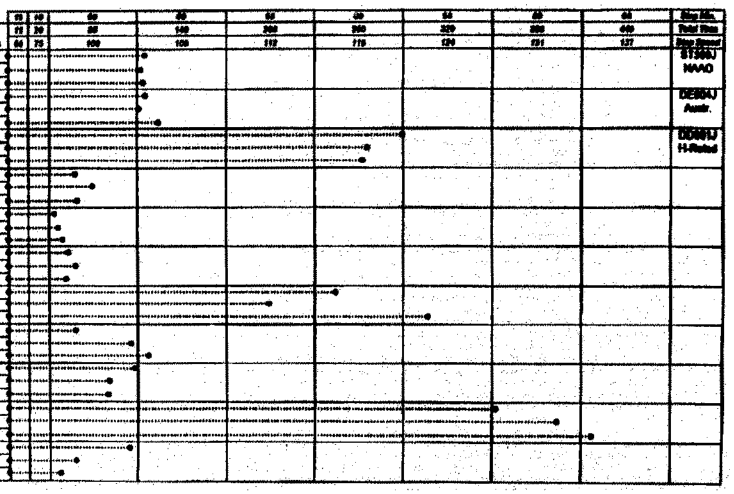
The testing of the GY tires that Ford provided to us was completed, summarized, and reviewed with BFOE this morning. Results are that these particular GY tires performed slightly better, though marginally so, than the sample of current production Wilderness AT tires in the special (non-conventional) high speed and plunger tests. The data was subsequently faxed to Ford; copies available upon request.

Brian J. Queiser
OE Passenger & LTR Tire Development *ph.* *330.379.4560*
Bridgestone/Firestone Technology Company *fax* *330.379.6563*

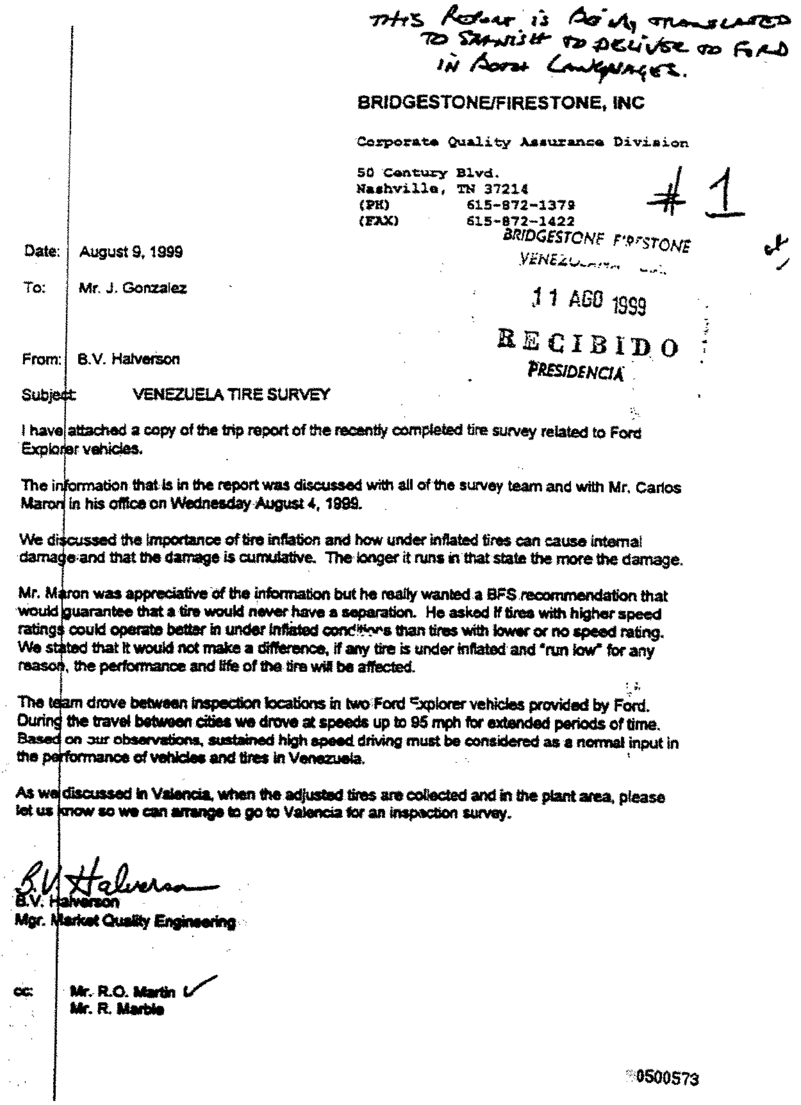
X
Saudi Arabia

Special Ford High Speed Testing / 2nd Round

Constr.	Final Step Spd (mph)	Final Step Mins	Total Minutes
Firestone	100	4	84
P255/70R15 109S	106	3	83
ST309J NAAO	106	5	85
Firestone	106	4	84
P255/70R16 109S	106	2	82
DE804J Austr.	106	15	95
Firestone	118	52	252
P265/70R16 109H	118	36	236
DD891J Euro.	118	33	233
Michelin	100	20	40
LT245/75R16 120R	100	33	53
LR-E LTX A/T	100	24	44
Firestone	100	5	25
P255/70R16 109R	100	7	27
Venezuela	100	10	30
Firestone	100	15	35
P235/75R15 105R	100	20	40
Venezuela	100	14	34
Dunlop	118	16	216
265/70R16 112S	112	31	171
Toyota Prado	124	19	279
Yokohama	100	41	61
31x10.50R15LT 109S	100	56	76
Mitsu. Pajero	106	8	88
Goodyear	100	59	79
P245/70R15 105S	100	42	62
Jeep Grand Cherokee	100	39	59
Bridgestone	131	3	323
275/70R16 114H	131	45	365
Chevy Tahoe	137	9	389
Bridgestone	100	53	73
P255/70R16 109S	100	20	40
Dueler A/T	100	8	28



all tests: load = 1500 lbs
all tests: infl. = 20 psi



THIS REPORT IS BEING TRANSLATED TO SPANISH TO DELIVER TO FORD IN BOTH LANGUAGES.

BRIDGESTONE/FIRESTONE, INC

Corporate Quality Assurance Division

50 Century Blvd.
Nashville, TN 37214
(PH) 615-872-1379
(FAX) 615-872-1422

#1

BRIDGESTONE FIRESTONE
VENEZ[illegible]
11 AGO 1999
RECIBIDO
PRESIDENCIA

Date: August 9, 1999

To: Mr. J. Gonzalez

From: B.V. Halverson

Subject: VENEZUELA TIRE SURVEY

I have attached a copy of the trip report of the recently completed tire survey related to Ford Explorer vehicles.

The information that is in the report was discussed with all of the survey team and with Mr. Carlos Maron in his office on Wednesday August 4, 1999.

We discussed the importance of tire inflation and how under inflated tires can cause internal damage and that the damage is cumulative. The longer it runs in that state the more the damage.

Mr. Maron was appreciative of the information but he really wanted a BFS recommendation that would guarantee that a tire would never have a separation. He asked if tires with higher speed ratings could operate better in under inflated conditions than tires with lower or no speed rating. We stated that it would not make a difference, if any tire is under inflated and "run low" for any reason, the performance and life of the tire will be affected.

The team drove between inspection locations in two Ford Explorer vehicles provided by Ford. During the travel between cities we drove at speeds up to 95 mph for extended periods of time. Based on our observations, sustained high speed driving must be considered as a normal input in the performance of vehicles and tires in Venezuela.

As we discussed in Valencia, when the adjusted tires are collected and in the plant area, please let us know so we can arrange to go to Valencia for an inspection survey.

B.V. Halverson
B.V. Halverson
Mgr. Market Quality Engineering

cc: Mr. R.O. Martin ✓
Mr. R. Marble

DOCUMENT 1

VENEZUELA TIRE SURVEY: AUGUST 2-5, 1999

FORD EXPLORER: P255/70R16 WILDERNESS AT

P235/75R15 RADIAL ATX

TEAM: **FORD:**

Carlos Maron, Head of Local Development (meeting only)
Oscar Romero, Manager Engineering Service and Vehicle Evaluation
Roselia Moreno, Purchasing Products Engineer, Explorer
Edivis Caballero, Service Engineer, Explorer and Ranger

BFS:

Bruce Halverson, Manager Market Quality Engineering
Roger Marble, Senior Project Engineer Latin America Tire Development
Luis Abreu, Technical Manager Valencia Plant
Pedro Martinez, O.E. Sales Valencia

FORD DEALERS VISITED:

Lago Motors	Maracaibo
Auto Cabimas	Cabimas
Punto Fijo Motors	Punto Fijo
Deel	Barquisimento

WORLDWIDE DISASTER AID AND INFORMATION VIA THE INTERNET

Venezuela Map

Posted on Thu, 10 Jul 1997 14:27:31 GMT MARACAIBO

Map courtesy of Magellan Geographix

TOTAL VEHICLES AND TIRES

- 36 Explorers * (Recorded VIN and odometer readings)
- 132 tires (Recorded Inflation, DOT serial, RTD, Chip/Tear, Repairs)

	Wilson	Valencia
P255/70R16 Wilderness AT	23	33
P235/75R15 Radial ATX	3	73

FORD USA INFLATION SPECIFICATION:	30 psi Front	30 psi Rear
FORD VENEZUELA INFLATION SPECIFICATION	26 psi Front	26 psi Rear
Tires with inflation below Ford Specified	12	12

Tires with pressure below 20 psi.

RR	11psi	2 nails/sidewall cut/tread cut to steel
RR	16 psi	1 bolt in tread, (slow leak)
RR	17 psi	could not inspect tread area
RR	19 psi	could not inspect tread area
RR	15 psi	could not inspect tread area
Spare	0 psi	puncture (tire was removed from RR position)

* Three Explorers not included in data because of tire brand, and size fitment

MARACAIBO:

Vehicle Mileage	**29,211 Km**	**to**	**113,335 Km**
Ave Tire Wear	**30 %**		
Tires inspected	**44**		

Damage Conditions

Tread cut to steelcord	**7**
Thorn to steelcord	**1**
Screw/nails	**2 (11psi)**
Bolt	**1 (16 psi)**
Total	**11 tires**

25% are Potential Problem Tires

1 P255/70R13 W2...037 with BLD condition. Tire had a repair on the IL and Penetration visible in #1 belt.

CABIMAS:

Vehicle Mileage	**25,158**	**to**	**46,211**
Ave Tire Wear	**25%**		
Tires inspected	**20**		

One tire with low inflation 17psi

PUNTO FIJO:

Vehicle Mileage	13,755Km	to	40,289Km
Ave Tire Wear	25%		
Tires Inspected	16		

1 tire with low inflation (19psi)

BARQUISIMENTO:

Vehicle Mileage	12,227Km	to	103,293Km
Ave Tire Wear	20%		
Tires inspected	24		

2 tires with low inflation (19psi, 15psi)

LR & RR tires on Explorer with 103,294 Km worn to 3mm and 4mm(probably original tires)

COMMENTS:

REPAIRS- We observed only one repair of the type where the plug extends up through the puncture from the inside of the tire.

TREAD/CHIP CONDITIONS- The definition of these conditions is:

1= condition observed by trained tire engineer
2= condition observed by customer but he would not be concerned about it
3= condition observed by customer and he would object

132 tires were inspected and had the following conditions:

Rating of 1 = 61%
Rating of 2 = 17%
Rating of 3 = 1.5%

Tire age- The oldest tire was a P255/70R 16 Wilderness AT with a DOT serial of VN 504. The total distribution was:

1999	5 %
1998	61%
1997	22 %
1996	7 %
1995	2 %
1994	1 %

SERVICE CONDITIONS:

-The main highways are tarmac but are not particularly smooth. In the hill areas the drop off at the edge of the roads is steep.

-City streets are very rough and have lot of chuck holes.

-Highway speeds are unrestrained although there are posted limits. (We experienced speeds up to 95 mph for lengthy periods of time.)

- Driving habits are aggressive.

SUMMARY:

Low inflation operating conditions caused by any of the following can cause damage to the tire when it continues to be run with inadequate pressure:

- punctures, cuts which cause slow leaks and tire continues to be used with low inflation

- poor tire maintenance

- improper repairs

POSSIBLE ACTIONS:

FORD:	Send customer letters on the importance of tire inflation
	Increase recommended inflation pressure on the vehicle
	Educate Ford Dealers on the importance of tire maintenance i.e. inflation and visual inspection
BFS:	Check RMA for tire repair charts for Spanish Translation
	Special collection of tires submitted for adjustment from Explorers, Blazers, and Toyota SUV's for analysis in Valencia.
NOTE:	The week of July 4, 1999, Valencia began to ship P255/70R16Wilderness tires to Ford with polyester body ply and a cap ply for the nylon body P235/75R15 Radial ATX added a cap ply. We did not see any of those tires in the survey.

"Free translation"
Document 2

(PRELIMINARY REPORT)

SUMMARY OF THE EXPLORER SURVEY

Source of Information	Problem	Observations or possible Causes	Result or possible Effects
TIRE EVALUATION IN EXPLORER VEHICLES BEING SERVICED IN FORD DEALERS LOCATED AT: MARACAIBO, CABIMAS, PUNTO FIJO AND BARQUISIMETO 132 TIRES INSPECTED	Low inflation pressure 8 Tires = 6 %	1) Punctures with nails, screws, glass and others metallic objects. Repairs may not be adequate 4 Tires = 3 %	Steelcord corrosion which may result in Tire separation and tread belt leaving belt and casing
		2) Protruded weld spots on rim surface. - Valve failures - Poor maintenance of inflation pressure	Progressive air leak, which favors the heat generation, flexion and fatigue of the tire inducing tread separation and tire failure
	Tread Cuts to Tire Steelbelt	3) Impact with metallic objects, glass and others sharp edge objects	Same as Item 1
	Low inflation pressure in Explorer vehicles in FORD Showroom	4) Protruded weld spots on rim surface - Tires coming with low inflation pressure from OEM. Plant	Same as Item 2
BFVZ Survey to Explorer users Total contacted customers : 2.183 Satisfied Customers = 1.703 78 % Reporting Incidence = 480 22 %	Punctures (159)	- With nails, screws and others objects in the driveways	Same as Item 1
	Sidewall undulations (64)	- Wide sidewall splices	Visual effects
	Vibrations (63)	- High tire/rim run-out - Unbalance of rim/tire set or wheel mounting chuck	Vehicle vibration vertically and horizontally
	Irregular tread wear (38)	- Unbalance of tire/rim set or wheel mounting chuck - Vehicle wheel miss alignment - Tire are not being rotated periodically	Premature and irregular tread wear
	Tire slips in wet surface (16)	Need to be investigated by BFS and FORD Technical Areas	
	Impact breaks (34)	Impacts with objects in the driveways	Body ply breakage and tire must be scrapped
	Tread separations (31)	Same as Item 1, 2, 3, and 4	
	OTHERS (75)		
I.E. ABREU's visit to El Tigre, Anzoategui	Explorer vehicle roll over due to tread leaving casing	- Excessive speed 173 Km/Hr (26 Km in 9 Minutes) - Heavy load, 8 passengers plus luggage. - High pavement temperature (55°C at 1.20 p.m)	Tire fatigue and separations

(REPORTE PRELIMINAR)

RESUMEN DE ESTUDIO SOBRE EXPLORER

Fuente de Información	**Problema**	**Observaciones o Causas posibles**	**Resultado o Efecto posible**
Evaluación de Cauchos de Explorers en servicio en las concesionarias de Maracaibo, Cabimas, Pto. Fijo y Barquisimeto **132 Cauchos Inspeccionados**	Baja presión de inflado 8 cauchos = 6 %	1) Pinchazos con clavos, tornillos, vidrios y objetos metálicos. Las reparaciones podrían no ser adecuadas 4 cauchos = 3 %	Corrosión en los Alambres de Acero, lo cual produce a la larga separación y pérdida de la banda de rodamiento
		2) - Protuberancias en la costura del rim (puntos de soldadura) - Falla de válvula - Falta de mantenimiento en Presión de Inflado	Fuga progresiva del aire, lo cual favorece el aumento en la generación de calor, flexión y fatiga del caucho, induciendo las separaciones en la banda
	Cortes en la banda de rodamiento, alcanzando los Alambres de Acero 8 cauchos = 6 %	3) Impactos con objetos metálicos, vidrios y otros objetos cortantes.	Igual al Punto 1
	Baja presión de inflado en los vehículos en exposición (22 y 26 psi)	4) - Protuberancias en la costura del rim - Baja presión de inflado en planta Ford	Igual al Punto 2
Encuesta hecha por BFVZ a usuarios de Explorer Total Clientes Contactados 2.183 (Satisfechos) = 1.703 78 % (Reportando incidencias) = 486 22 %	Pinchazos (159)	Penetración por clavos, tornillos y otros objetos en las vías	Igual al Punto 1
	Ondulaciones en la Pared (64)	Ancho en los empates de tela de cuerpo	Efecto visual
	Vibraciones (63)	- Alto run out del caucho o rim - Desbalanceo del conjunto caucho/rim y/o manzana	Vibraciones del vehículo en forma horizontal y vertical entre 80 y 120 Km / Hr
	Desgaste irregular de Banda de Rodamiento (38)	- Desbalanceo del conjunto caucho/rim y/o manzana - Desalineación del vehículo - Falta de rotación de los cauchos	Desgaste prematuro e irregular de la Banda de Rodamiento
	Caucho patina en húmedo (16)	Necesita ser investigado por las Areas Técnicas de Bridgestone Firestone y Ford	
	Ruptura por impacto (34)	Golpe con objeto en la vía y con las aceras	Pérdida del caucho por la ruptura de las lonas (telas)
	Separación en la Banda de Rodamiento (31)	Igual que puntos # 1, 2, 3, y 4	
	Otros (75)		
Visita de L. E. Abreu a El Tigre, Estado Anzoategui	**Volcamiento de vehículo por pérdida de Banda de Rodamiento**	- Exceso de velocidad - 173 Km/Hr Aprox. (26 Km en 9 minutos) - **Carga pesada (8 pasajeros más equipaje)** - **Alta temperatura del pavimento (55°C) (1.20 pm)**	Fatiga del caucho y Separaciones

RECOMMENDATIONS

(Based on investigation done in sites and surveys)

1. Send customer letters on the importance of tire inflation.

2 Request FORD Engineering to consider adopting U.S.A. inflation standards for Venezuela :

	Tire Inflation Pressure	
	Front	Rear
VENEZUELA	28 psi	26 psi
U. S. A.	30 psi	30 psi

3. Educate FORD Dealers on the importance of tire maintenance of inflation pressure and visual inspection of tires while vehicle is in service.

4. Distribute to all tire repair shops a tire repair manual for punctures.

5. Investigate with the Technicians and Development Engineers of FORD Detroit and BFS Akron / Nashville :

   Possibility of changing tread compound to improve traction and ride/handling in dry and wet pavement.

6. Improve service / communications between FIRESTONE Distributors and FORD Dealers to give better service to the final user (THE CUSTOMER)

Document 2

RECOMENDACIONES

(Basadas en las investigaciones realizadas)

1. Enviar a los usuarios de Explorer una carta donde se le explique la importancia de la presión de inflado.
   Colocar el mismo folleto en el manual del propietario de cada vehículo a vender.

2 Solicitar al Dpto. de Ingeniería de FORD, considerar adoptar la presión de inflado del caucho usada en U.S.A, para las Explores fabricadas en Venezuela

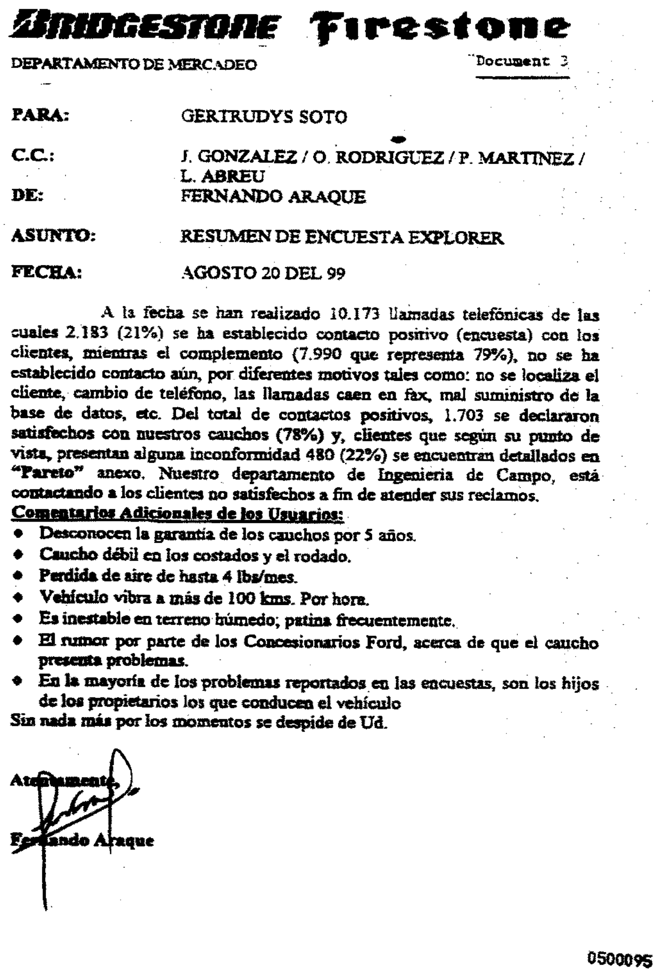
	Presión de Inflado del Caucho	
	Delantero	Trasero
VENEZUELA	28 psi	26 psi
U. S. A.	30 psi	30 psi

3. Educar a los concesionarios en la importancia de un buen mantenimiento de la presión de inflado y chequeos de los cauchos en los vehículos en servicio.

4. Distribuir en todos los establecimientos de reparación de cauchos, un folleto práctico de correcta reparación de pinchazos.

5. Investigar con los Técnicos y Desarrollo de Proceso FORD Detroit y BFS Akron / Nashville
   - Posibilidad de cambiar compuesto de rodado para mejorar tracción y manejo en pavimento seco y húmedo.

6. Mejorar el enlace entre distribuidores FIRESTONE y concesionarios con el fin de prestar un mejor servicio al usuario final.



BRIDGESTONE Firestone

DEPARTAMENTO DE MERCADEO

Document 3

PARA: GERTRUDYS SOTO

C.C.: J. GONZALEZ / O. RODRIGUEZ / P. MARTINEZ / L. ABREU

DE: FERNANDO ARAQUE

ASUNTO: RESUMEN DE ENCUESTA EXPLORER

FECHA: AGOSTO 20 DEL 99

A la fecha se han realizado 10.173 llamadas telefónicas de las cuales 2.183 (21%) se ha establecido contacto positivo (encuesta) con los clientes, mientras el complemento (7.990 que representa 79%), no se ha establecido contacto aún, por diferentes motivos tales como: no se localiza el cliente, cambio de teléfono, las llamadas caen en fax, mal suministro de la base de datos, etc. Del total de contactos positivos, 1.703 se declararon satisfechos con nuestros cauchos (78%) y, clientes que según su punto de vista, presentan alguna inconformidad 480 (22%) se encuentran detallados en "Pareto" anexo. Nuestro departamento de Ingeniería de Campo, está contactando a los clientes no satisfechos a fin de atender sus reclamos.

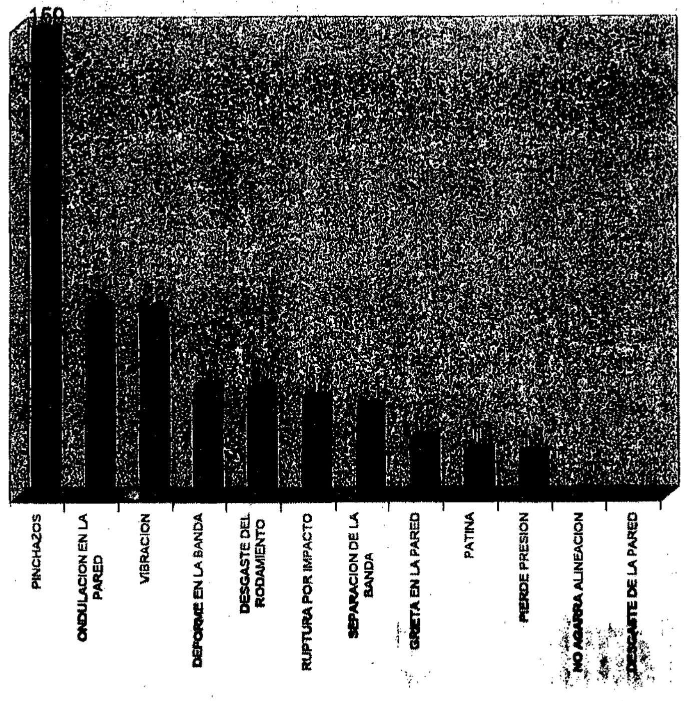
Comentarios Adicionales de los Usuarios:

- Desconocen la garantía de los cauchos por 5 años.
- Caucho débil en los costados y el rodado.
- Perdida de aire de hasta 4 lbs/mes.
- Vehículo vibra a más de 100 kms. Por hora.
- Es inestable en terreno húmedo; patina frecuentemente.
- El rumor por parte de los Concesionarios Ford, acerca de que el caucho presenta problemas.
- En la mayoría de los problemas reportados en las encuestas, son los hijos de los propietarios los que conducen el vehículo

Sin nada más por los momentos se despide de Ud.

Atentamente,

Fernando Araque



RESUMEN DE ENCUESTA EXPLORER

DEL 04/08/99 AL 19/08/99

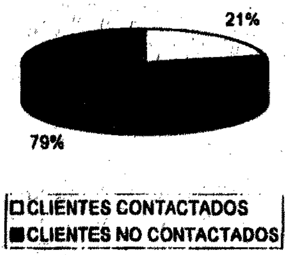
Glosario de Términos del Pareto.

- **Pinchazos:** Objeto extraño que penetra en la superficie del neumático; Ej. Tornillos, pedazos de vidrio, clavos, etc.
- **Ondulación en la Pared:** Depresión provocada por sobre medida del empate de tela.
- **Vibración:** Irregularidad en la redondez radial que experimenta el neumático o el rim.
- **Desgaste de Rodamiento:** Provocado por problemas mecánicos del vehículo.
- **Patina:** Deslizamiento del neumático sobre pavimento húmedo.
- **Perdida de Presión:** Puede ser ocasionado por fugas de aire del neumático, rim y/o válvula.
- **Ruptura por Impacto:** Ocasionado por impacto del caucho contra objetos extraños, Ej. Pared, hueco, etc.
- **Grieta en la Pared:** Cualquier irregularidad que presente la pared del caucho, que pueda ser apreciada visualmente por el cliente.
- **Separación de Banda:** Separación entre la banda de rodamiento y/o entre estabilizadores de acero que resulta en perdida de la banda de rodamiento, quedando descubierta la carcaza del caucho.
- **Deformidad en la Banda:** Cualquier irregularidad que presenta la banda de rodamiento del caucho, que puede ser apreciada visualmente por el cliente.

RESUMEN DE ENCUESTA EXPLORER

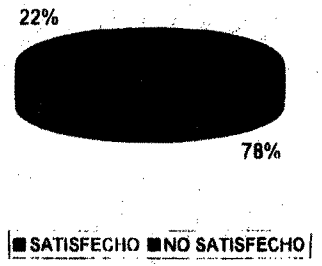
DEL 4 AL 19 DE AGOSTO DEL 99

TOTAL DE LLAMADAS TELEFONICAS REALIZADAS

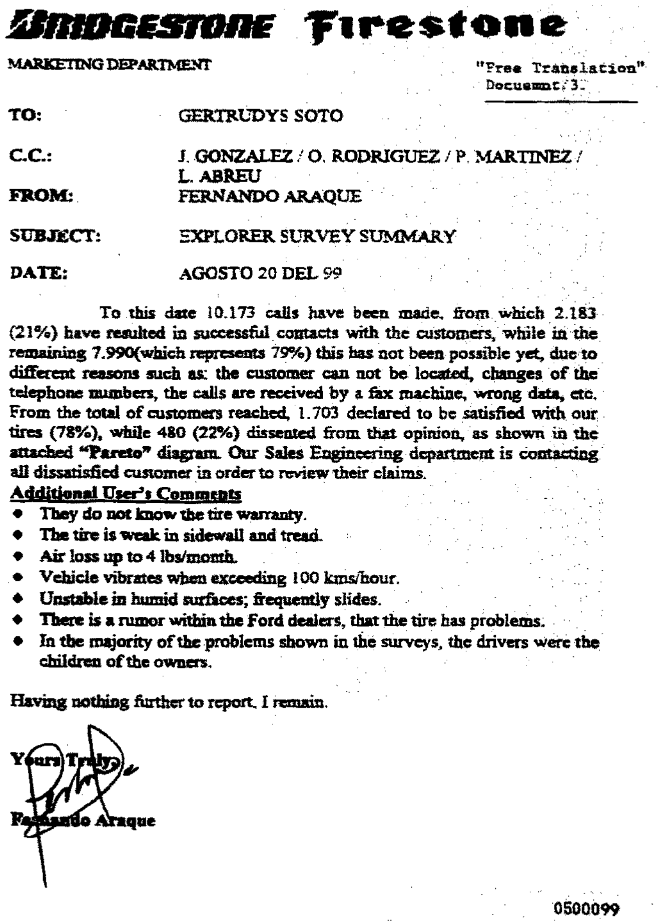


CLIENTES CONTACTADOS	2.183
CLIENTES NO CONTACTADOS	7.990
TOTAL	10.173

RESULTADOS DE LA ENCUESTA



SATISFECHO	1.703
NO SATISFECHO	480
TOTAL	2.183



BRIDGESTONE Firestone

MARKETING DEPARTMENT

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TO: GERTRUDYS SOTO

C.C.: J. GONZALEZ / O. RODRIGUEZ / P. MARTINEZ / L. ABREU

FROM: FERNANDO ARAQUE

SUBJECT: EXPLORER SURVEY SUMMARY

DATE: AGOSTO 20 DEL 99

To this date 10.173 calls have been made, from which 2.183 (21%) have resulted in successful contacts with the customers, while in the remaining 7.990(which represents 79%) this has not been possible yet, due to different reasons such as: the customer can not be located, changes of the telephone numbers, the calls are received by a fax machine, wrong data, etc. From the total of customers reached, 1.703 declared to be satisfied with our tires (78%), while 480 (22%) dissented from that opinion, as shown in the attached **"Pareto"** diagram. Our Sales Engineering department is contacting all dissatisfied customer in order to review their claims.

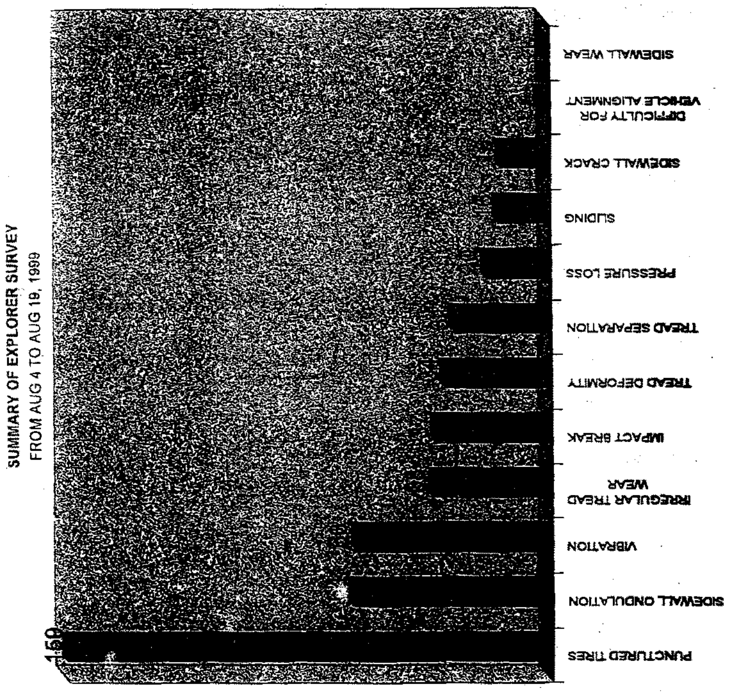
Additional User's Comments

- They do not know the tire warranty.
- The tire is weak in sidewall and tread.
- Air loss up to 4 lbs/month.
- Vehicle vibrates when exceeding 100 kms/hour.
- Unstable in humid surfaces; frequently slides.
- There is a rumor within the Ford dealers, that the tire has problems.
- In the majority of the problems shown in the surveys, the drivers were the children of the owners.

Having nothing further to report, I remain.

Yours Truly,

Fernando Araque

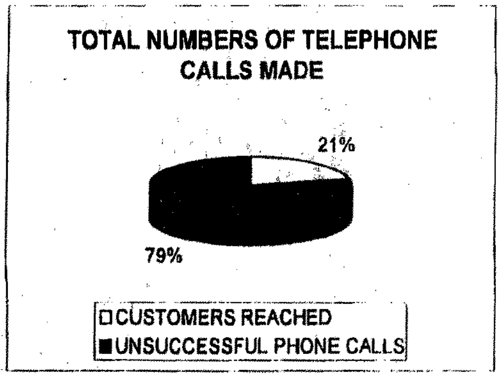


SUMMARY OF EXPLORER SURVEY
FROM AUG 4 TO AUG 19, 1999

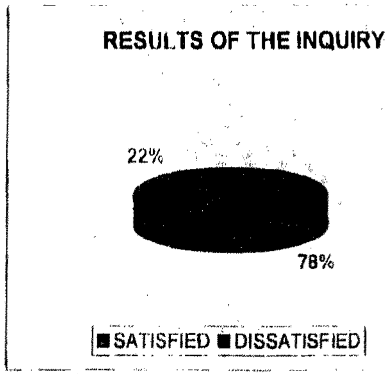
GLOSSARY OF THE PARETO TERMS

- **Punctured Tires:** Foreign object which penetrates the surfaces of the tire: i.e.: screws. piece of glass, nails, etc.
- **Sidewall Ondulation:** Depression caused by the superimposition of the jointure of a very long piece of material.
- **Vibration:** Irregularity in the radial roundness experienced by the tire or the rim.
- **Irregular Tread Wear:** Caused by mechanical problems of the vehicle.
- **Sliding:** Sliding of the tire on wet pavement.
- **Pressure Loss:** May be due to air leakage of the tire, rim and/or valve.
- **Impact Break:** Produced by the impact of the tire against outside objects.
- **Sidewall Crack:** Any irregularity shown in the tire sidewall, that may be visually appreciated by the customer.
- **Tread Separation:** Separation between the tread and/or between the steel stabilizers which results in tread loss and the exposure of tire carcass.
- **Tread Deformity:** Any irregularity shown by the tire tread, which can be visually appreciated by the customer.

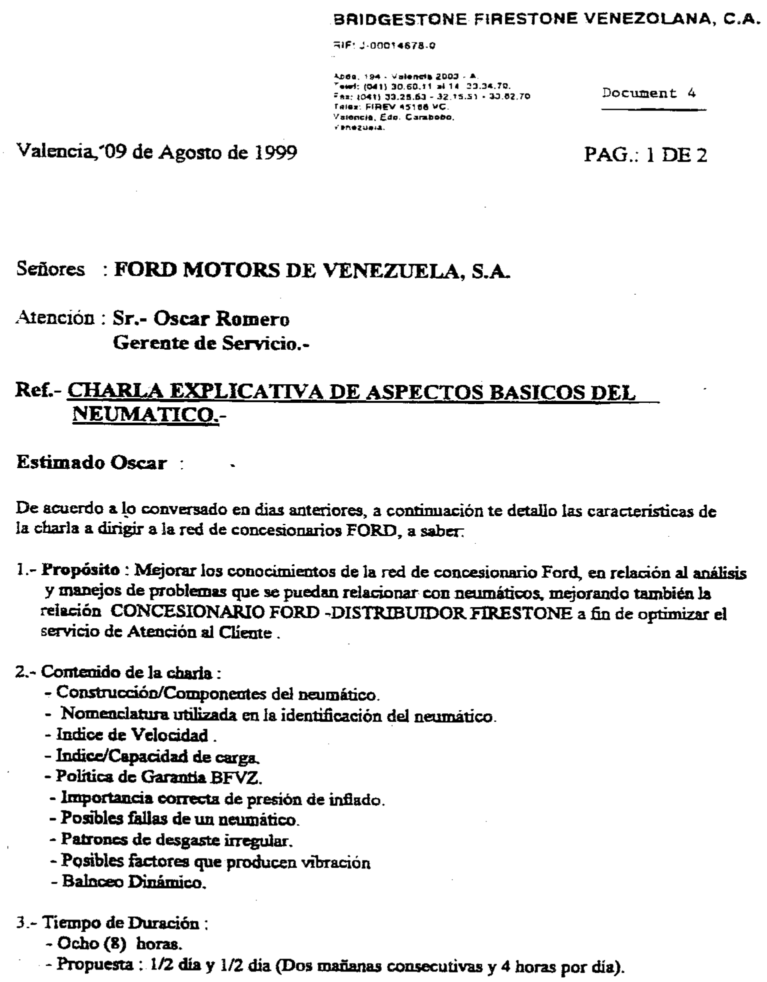
SUMMARY OF EXPLORER SURVEY
FROM AUG. 4 TO AUG. 19, 1999


TOTAL NUMBERS OF TELEPHONE CALLS MADE

CUSTOMERS REACHED	2.183
UNSUCCESSFUL PHONE CALLS	7.990
TOTAL	10.173


RESULTS OF THE INQUIRY

SATISFIED	1.703
DISSATISFIED	480
TOTAL	2.183



BRIDGESTONE FIRESTONE VENEZOLANA, C.A.
RIF: J-00014678-0

Apdo. 194 - Valencia 2003 - A.
Telef: (041) 30.60.11 al 14 33.34.70.
Fax: (041) 33.25.63 - 32.15.51 - 33.82.70
Telex: FIREV 45168 VC.
Valencia, Edo. Carabobo,
Venezuela.

Document 4

Valencia, 09 de Agosto de 1999

PAG.: 1 DE 2

Señores : **FORD MOTORS DE VENEZUELA, S.A.**

Atención : **Sr.- Oscar Romero**
Gerente de Servicio.-

Ref.- CHARLA EXPLICATIVA DE ASPECTOS BASICOS DEL NEUMATICO.-

Estimado Oscar :

De acuerdo a lo conversado en dias anteriores, a continuación te detallo las características de la charla a dirigir a la red de concesionarios FORD, a saber:

1.- **Propósito** : Mejorar los conocimientos de la red de concesionario Ford, en relación al análisis y manejos de problemas que se puedan relacionar con neumáticos, mejorando también la relación CONCESIONARIO FORD -DISTRIBUIDOR FIRESTONE a fin de optimizar el servicio de Atención al Cliente.

2.- Contenido de la charla :
- Construcción/Componentes del neumático.
- Nomenclatura utilizada en la identificación del neumático.
- Indice de Velocidad.
- Indice/Capacidad de carga.
- Política de Garantía BFVZ.
- Importancia correcta de presión de inflado.
- Posibles fallas de un neumático.
- Patrones de desgaste irregular.
- Posibles factores que producen vibración
- Balnceo Dinámico.

3.- Tiempo de Duración :
- Ocho (8) horas.
- Propuesta : 1/2 día y 1/2 día (Dos mañanas consecutivas y 4 horas por día).

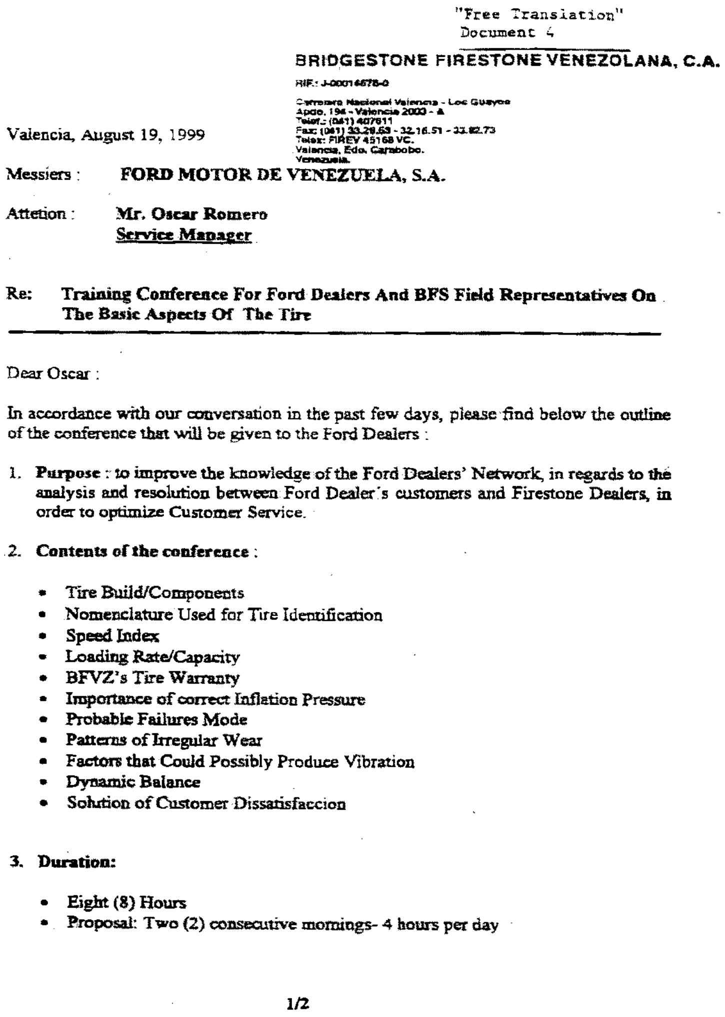
Durante el segundo día se hará una dinámica de trabajo entre el Concesionario Ford y el Distribuidor Bridgestone Firestone. En esta actividad participarán el Asesor Técnico y el Gerente de la zona de nuestra oficina de Atención al Cliente para crear un canal de comunicación directo entre ambas partes, con el fin de mejorar el tiempo de respuesta al cliente y por ende mejorar el servicio.

Sin otro particular y esperando de su respuesta a fin de desarrollar esta actividad en la brevedad posible, le saluda.

Atentamente,

Pedro Martínez
Gerente de Venta Equipo Original

C.C.: Srs.- Hector Rodriguez - FORD
Antonio Da silva - FORD
Carlos Maron - FORD
Edivia Caballero - FORD
Jorge González - BFVZ
Oscar Rodríguez - BFVZ
Gertrudis Soto - BFVZ



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BRIDGESTONE FIRESTONE VENEZOLANA, C.A.
RIF.: J-00014678-0

Carretera Nacional Valencia - Los Guayos
Apdo. 194 - Valencia 2003 - A
Telef.: (041) 407611
Fax: (041) 33.29.53 - 32.16.51 - 33.82.73
Telex: FIREV 45168 VC.
Valencia, Edo. Carabobo.
Venezuela.

Valencia, August 19, 1999

Messiers : **FORD MOTOR DE VENEZUELA, S.A.**

Attetion : **Mr. Oscar Romero**
Service Manager

Re: **Training Conference For Ford Dealers And BFS Field Representatives On The Basic Aspects Of The Tire**

Dear Oscar :

In accordance with our conversation in the past few days, please find below the outline of the conference that will be given to the Ford Dealers :

1. **Purpose** : to improve the knowledge of the Ford Dealers' Network, in regards to the analysis and resolution between Ford Dealer's customers and Firestone Dealers, in order to optimize Customer Service.

2. **Contents of the conference** :

   - Tire Build/Components
   - Nomenclature Used for Tire Identification
   - Speed Index
   - Loading Rate/Capacity
   - BFVZ's Tire Warranty
   - Importance of correct Inflation Pressure
   - Probable Failures Mode
   - Patterns of Irregular Wear
   - Factors that Could Possibly Produce Vibration
   - Dynamic Balance
   - Solution of Customer Dissatisfaccion

3. **Duration:**

   - Eight (8) Hours
   - Proposal: Two (2) consecutive mornings- 4 hours per day

During the second day a work session will be conducted with the Ford Dealer and the Bridgestone Firestone Dealer and the Zone Manager of our Customer Service Office Will participate in this activity in order to create a channel of direct communication on both sides, to improve the response time to the customer, thus improving the service.

Having nothing further to inform and hoping to hear from you soon to the end of implementing this activity the earliest possible, I remain.

Your Truly

Pedro Martinez
Original Equipment Manager

c.c.: Messrs :	Hector Rodriguez	- FORD
	Antonio Da silva	- FORD
	Carlos Maron	- FORD
	Edivia Caballero	- FORD
	Jorge González	- BFVZ
	Oscar Rodriguez	- BFVZ
	Gertrudis Soto	- BFVZ

BRIDGESTONE FIRESTONE VENEZOLANA,C.A

Valencia , 23 de Agosto de 1999

A : Todos los Gerentes de Zonas

De : Sr. Oscar Rodríguez
Sra. Gertrudys Soto de Garces

La Dirección de Mercadeo y Ventas conjuntamente con la Gerencia de Mercadeo y Operaciones de Ventas ha diseñado una atractiva promoción dirigida a todos los usuarios de Vehículos Rústicos .

Esta actividad será coordinada por la Gerencia de Atención al Cliente y los usuarios conocerán la promoción a través de una cordial invitación extensiva de BFVZ, a visitar el distribuidor autorizado mas cercano (Tire Center , Bridgestone Firestone , Tire Express ó Firestone) y recibir :

- ***REVISIÓN** de sus cauchos **GRATIS***
- *Servicio de **ROTACIÓN** (gratis en caso de ser necesario)*

Toda nuestra red de Distribución debe conocer de nuestra promoción especial y ofrecer el atractivo que nos caracteriza como la empresa líder en la industria del caucho el mejor producto, la mejor atención personalizada y nuestros excelentes precios.

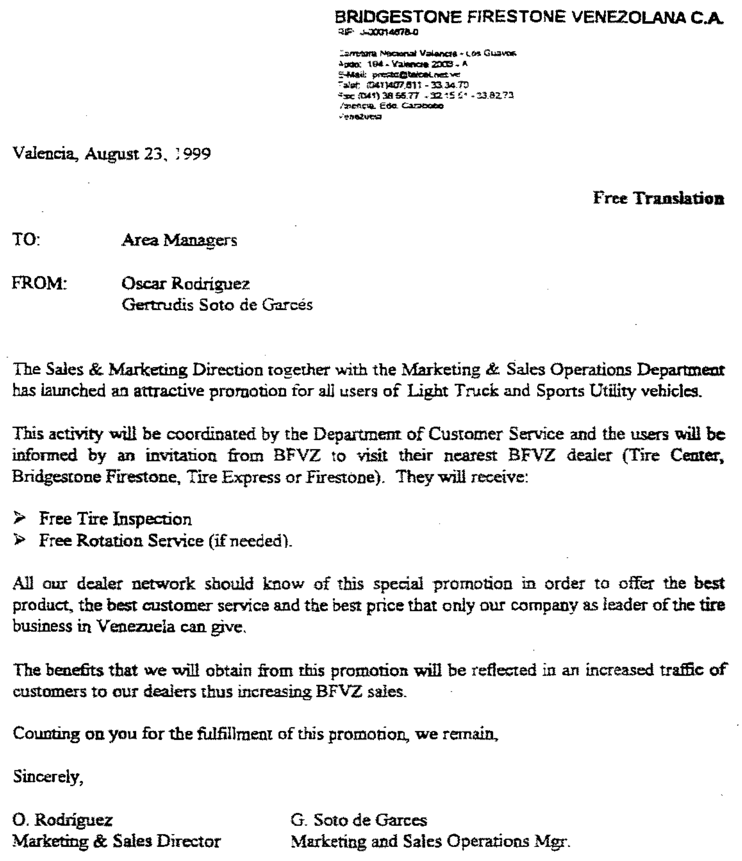
*Los beneficios que obtendremos con esta promoción se verán reflejados en un incremento del trafico de usuarios →**AUMENTO DE LAS VENTAS** .*

Esperando contar con su valiosa colaboración para el desempeño de esta actividad y orgullosos de contar con un valioso equipo humano.

Atentamente ,

Oscar Rodríguez
Director de Mercadeo y Ventas

Gertrudys Soto de Garces
Gerente de Mercadeo y Operaciones de Ventas



BRIDGESTONE FIRESTONE VENEZOLANA C.A.
RIF: J-00014678-0

Carretera Nacional Valencia - Los Guayos
Apdo: 184 - Valencia 2003 - A
E-Mail: presto@telcel.net.ve
Telef: (041)407.811 - 33.34.70
Fax: (041) 38.56.77 - 32.15.61 - 33.82.73
Valencia, Edo. Carabobo
Venezuela

Valencia, August 23, 1999

Free Translation

TO: Area Managers

FROM: Oscar Rodriguez
Gertrudis Soto de Garcés

The Sales & Marketing Direction together with the Marketing & Sales Operations Department has launched an attractive promotion for all users of Light Truck and Sports Utility vehicles.

This activity will be coordinated by the Department of Customer Service and the users will be informed by an invitation from BFVZ to visit their nearest BFVZ dealer (Tire Center, Bridgestone Firestone, Tire Express or Firestone). They will receive:

- Free Tire Inspection
- Free Rotation Service (if needed).

All our dealer network should know of this special promotion in order to offer the best product, the best customer service and the best price that only our company as leader of the tire business in Venezuela can give.

The benefits that we will obtain from this promotion will be reflected in an increased traffic of customers to our dealers thus increasing BFVZ sales.

Counting on you for the fulfillment of this promotion, we remain,

Sincerely,

O. Rodriguez
Marketing & Sales Director

G. Soto de Garces
Marketing and Sales Operations Mgr.

- ***REVISION** de sus cauchos **GRATIS***
- *Servicio de **ROTACIÓN** (gratis en caso de ser necesario)*

Seria de gran placer contar con su valiosa visita a nuestros distribuidores y así disfrutar del mejor producto, la mejor atención personalizada y el excelente precio que solo la empresa líder en la industria del caucho puede ofrecerle .

*Sin mas a que hacer referencia y orgullosos de contar con usted como cliente de nuestros productos **BRIDGESTONE / FIRESTONE** , le saluda .*

Atentamente ,

BRIDGESTONE FIRESTONE VENEZOLANA,C.A

Oscar Rodriguez
Director de Mercadeo y Ventas

Gertrudys Soto de Garces
Gerente de Mercadeo y Operaciones de Ventas

BRIDGESTONE FIRESTONE VENEZOLANA C.A.
RIF: J-00014676-0

Carretera Nacional Valencia - Los Guayos
Apdo: 194 - Valencia 2003 - A
E-Mail: [illegible]@telcel.net.ve
Telef: (041)407.611 - 33.34.70
Fax: (041) 38.56.77 - 32.15.51 - 33.82.75
Valencia, Edo. Carabobo
Venezuela

Valencia, August 23, 1999

Free Translation

TO: Owners of Light Truck Vehicles

Dear Customer:

Bridgestone Firestone Venezolana, the Venezuelan leader in sales of light truck and sports Utility tires is launching a special promotion for all customers, available at all our authorized Bridgestone Firestone dealers.

We will like to extend a special invitation to you, our special customer, to visit your nearest BFVZ dealer and take advantage of the benefits of this promotion:

- Free Tire Inspection.
- Free Rotation Service (if needed).

It will be a pleasure to count with your visit to one of our dealers so that you can enjoy the best product, the best customer service and the excellent prices that only our company as leader of the tire business in Venezuela can offer you.

Looking forward to counting with you as our preferred customer, we remain,

Sincerely,
Bridgestone Firestone Venezolana C.A.
signed by:

Oscar Rodriguez	Gertrudis Soto de Garcés
Sales & Marketing Director	Marketing and Sales Operations Mgr.

BRIDGESTONE FIRESTONE VENEZOLANA C.A.
RIF: J-00014878-0

Carretera Nacional Valencia - Los Guayos
Apdo. 194 - Valencia 2003 - A
E-Mail: [illegible]@telcel.net.ve
Telef: (041)407.611 - 33.34.70
Fax: (041) 38.56.77 - 32.15.51 - 33.82.73
Valencia, Edo. Carabobo
Venezuela

JAG312/99
Valencia, August 24, 1999

Mr. E. Cassingena
President
Ford Motor de Venezuela, S.A.
Valencia

Dear Mr. Cassingena:

As agreed during the meeting held on July 29, 1999, we have proceeded to fully investigate the use of the tire Wilderness, sizes P235/75R15a and P255/70R16 in order to determine which actions are needed and establish a plan to meet our customer's needs.

Reports, documents, conclusions and recommendations regarding the inspections made, follow:

1. Document #1 contains a report by Messrs. Bruce Halverson and Roger Marble regarding the visits made to Ford Dealers in the Maracaibo, Cabimas, Punto Fijo and Barquisimeto Areas. Oscar Romero, Roselia Moreno and Edivia Caballero from Ford Venezuela and Luis Abreu and Pedro Martinez from BFVZ also participated in these visits.
2. Document #2: Summary of the main issues, possible causes and effects of the findings by BFVZ's Technical Department and recommendations after said evaluations.
3. Document #3: Summary of the survey made by BFVZ with the owners of Ford Explorer.
4. Based on the findings we are recommending a program as attached under "Document 4", Training program to Ford Dealers, and special work in conjunction with BFVZ dealers and BFVZ personnel.

BRIDGESTONE FIRESTONE VENEZOLANA C.A.
RIF: J-00014678-0

Carretera Nacional Valencia - Los Guayos
Apdo: 194 - Valencia 2003 - A
E-Mail: [illegible]
Telef. (041)437.611 - 33.34.70
Fax: (041) 36.55.77 - 32.15.51 - 33.82.73
Valencia, Edo. Carabobo
Venezuela

In addition to the above mentioned subjects and in particular to carry out an intensive program to identify if there are any problems which were not detected in the inspections, we have prepared a promotion for owners of Sports Utility Vehicles, offering a very interesting incentive to visit our service centers.

We are also in the process of preparing a brochure on the correct use and maintenance of the tires, which will be delivered to all Ford and BFVZ dealers to be distributed to Ford customers.

Through these programs we continue making all possible efforts to meet all the requests not only of Ford but also of all our customers. Should you require additional information regarding these reports, please do not hesitate in contacting us.

Sincerely,

Jorge A. González
President & Managing Director

cc: Sres. H. Rodríguez – Ford de Venezuela
O. Romero – Ford de Venezuela
A. Da Silva – Ford de Venezuela
G. Pereira – Ford de Venezuela
C. Marón – Ford de Venezuela
A. Stuart – BFOE, Southfield
H. Horton – BFS, Akron
R. Martin – BFS, Nashville
O. Rodríguez – BFVZ
L. Abreu – BFVZ
P. Martinez – BFVZ

DOCUMENT 1

VENEZUELA TIRE SURVEY: AUGUST 2-5, 1999

FORD EXPLORER: P255/70R16 WILDERNESS AT

P235/75R15 RADIAL ATX

TEAM: **FORD:**

Carlos Maron, Head of Local Development (meeting only)
Oscar Romero, Manager Engineering Service and Vehicle Evaluation
Roselia Moreno, Purchasing Products Engineer, Explorer
Edivia Caballero, Service Engineer, Explorer and Ranger

BFS:

Bruce Halverson, Manager Market Quality Engineering
Roger Marble, Senior Project Engineer Latin America Tire Development
Luis Abreu, Technical Manager Valencia Plant
Pedro Martinez, O.E. Sales Valencia

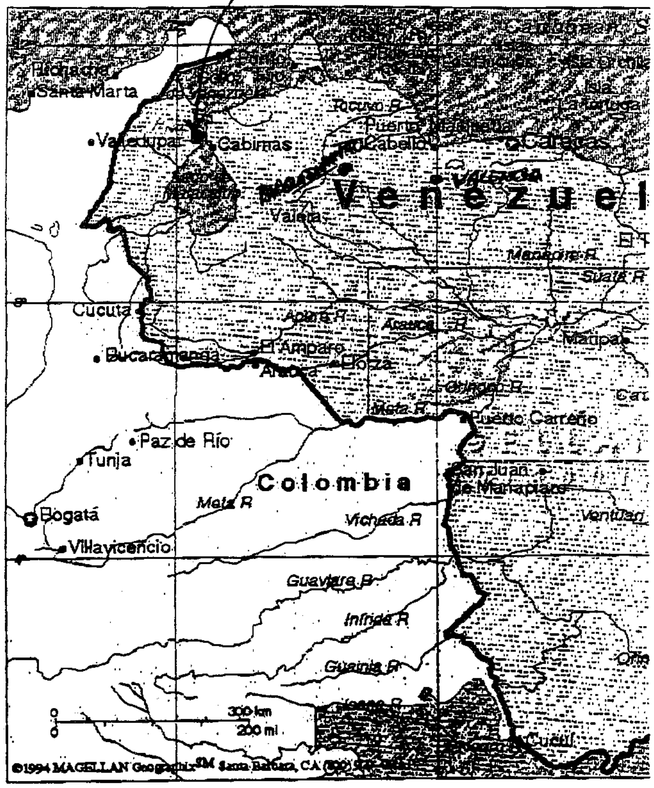
FORD DEALERS VISITED:

Lage Motors	Maracaibo
Auto Cabimas	Cabimas
Punto Fijo Motors	Punto Fijo
Deel	Barquisimento

WORLDWIDE DISASTER AID AND INFORMATION VIA THE INTERNET

Venezuela Map

Posted on Thu, 10 Jul 1997 14:27:31 GMT MARACAIBO



Map courtesy of Magellan Geographix

TOTAL VEHICLES AND TIRES

- 36 Explorers * (Recorded VIN and odometer readings)
- 132 tires (Recorded Inflation, DOT serial, RTD, Chip/Tear, Repairs)

	Wilson	Valencia
P255/70R16 Wilderness AT	23	33
P235/75R15 Radial ATX	3	73

FORD USA INFLATION SPECIFICATION:	30 psi Front	30 psi Rear
FORD VENEZUELA INFLATION SPECIFICATION:	28 psi Front	26 psi Rear
Tires with inflation below Ford Specified	12	12

Tires with pressure below 20 psi.

RR	11psi	2 nails/sidewall cut/tread cut to steel
RR	16 psi	1 bolt in tread, (slow leak)
RR	17 psi	could not inspect tread area
RR	19 psi	could not inspect tread area
RR	15 psi	could not inspect tread area
Spare	0 psi	puncture (tire was removed from RR position)

* Three Explorers not included in data because of tire brand, and size fitment

MARACAIBO:

Vehicle Mileage	**29,211 Km**	**to**	**113,335 Km**
Ave Tire Wear	**30 %**		
Tires inspected	**44**		

Damage Conditions	
Tread cut to steelcord	**7**
Thorn to steelcord	**1**
Screw/nails	**2 (11psi)**
Bolt	**1 (16 psi)**
Total	**11 tires**

25% are Potential Problem Tires

1 P235/70R13 W2...037 with BLB condition. Tire had a repair on the IL and Penetration visible in #1 belt.

CABIMAS:

Vehicle Mileage	**25,158**	**to**	**46,211**
Ave Tire Wear	**25%**		
Tires inspected	**20**		

One tire with low inflation 17psi

PUNTO FIJO:

Vehicle Mileage	13,755Km	to	40,289Km
Ave Tire Wear	25%		
Tires Inspected	16		

1 tire with low inflation (19psi)

BARQUISIMENTO:

Vehicle Mileage	12,227Km	to	103,293Km
Ave Tire Wear	20%		
Tires inspected	24		

2 tires with low inflation (19psi, 15psi)

LR & RR tires on Explorer with 103,294 Km worn to 3mm and 4mm(probably original tires)

COMMENTS:

REPAIRS- We observed only one repair of the type where the plug extends up through the puncture from the inside of the tire.

TREAD/CHIP CONDITIONS- The definition of these conditions is:

1= condition observed by trained tire engineer
2= condition observed by customer but he would not be concerned about it.
3= condition observed by customer and he would object

132 tires were inspected and had the following conditions:

Rating of 1 = 61%
Rating of 2 = 17%
Rating of 3 = 1.5%

Tire age- The oldest tire was a P255/70R 16 Wilderness AT with a DOT serial of VN.504. The total distribution was:

1999	5 %
1998	61%
1997	22 %
1996	7 %
1995	2 %
1994	1 %

SERVICE CONDITIONS:

-The main highways are tarmac but are not particularly smooth. In the hill areas the drop off at the edge of the roads is steep.

-City streets are very rough and have lot of chuck holes.

-Highway speeds are unrestrained although there are posted limits. (We experienced speeds up to 95 mph for lengthy periods of time.)

- Driving habits are aggressive.

SUMMARY:

Low inflation operating conditions caused by any of the following can cause damage to the tire when it continues to be run with inadequate pressure:

- punctures, cuts which cause slow leaks and tire continues to be used with low inflation
- poor tire maintenance
- improper repairs

POSSIBLE ACTIONS:

FORD: Send customer letters on the importance of tire inflation

Increase recommended inflation pressure on the vehicle

Educate Ford Dealers on the importance of tire maintenance, i.e. inflation and visual inspection

BFS: Check RMA for tire repair charts for Spanish Translation

Special collection of tires submitted for adjustment from Explorers, Blazers, and Toyota SUV's for analysis in Valencia.

NOTE: The week of July 4, 1999, Valencia began to ship P255/70R16Wilderness tires to Ford with polyester body ply and a cap ply for the nylon body P235/75R15 Radial ATX added a cap ply. We did not see any of those tires in the survey.

"Free Translation"
Document 2

(PRELIMINARY REPORT)

SUMMARY OF THE EXPLORER SURVEY

Source of Information	Problem	Observations or possible Causes	Result or possible Effects
TIRE EVALUATION IN EXPLORER VEHICLES BEING SERVICED IN FORD DEALERS LOCATED AT: MARACAIBO, CABIMAS, PUNTO FIJO AND BARQUISIMETO 132 TIRES INSPECTED	Low Inflation pressure 8 Tires = 6 %	1) Punctures with nails, screws, glass and others metallic objects. Repairs may not be adequate 4 Tires = 3 %	Steelcord corrosion which may result in Tire separation and tread belt leaving belt and casing
		2) Protruded weld spots on rim surface. - Valve failures - Poor maintenance of inflation pressure	Progressive air leak, which favors the heat generation, flexion and fatigue of the tire inducing tread separation and tire failure
	Tread Cuts to Tire Steelbelt	3) Impact with metallic objects, glass and others sharp edge objects	Same as Item 1
	Low Inflation pressure in Explorer vehicles in FORD Showroom	4) Protruded weld spots on rim surface - Tires coming with low inflation pressure from OEM. Plant	Same as Item 2
BFVZ Survey to Explorer users Total contacted customers : 2.183 Satisfied Customers = 1.703 78 % Reporting Incidence = 480 22 %	Punctures (159)	- With nails, screws and others objects in the driveways	Same as Item 1
	Sidewall undulations (64)	- Wide sidewall splices	Visual effects
	Vibrations (63)	- High tire/rim run-out - Unbalance of rim/tire set or wheel mounting chuck	Vehicle vibration vertically and horizontally
	Irregular tread wear (38)	- Unbalance of tire/rim set or wheel mounting chuck - Vehicle wheel miss alignment - Tire are not being rotated periodically	Premature and irregular tread wear
	Tire slips in wet surface (16)	Need to be investigated by BFS and FORD Technical Areas	
	Impact breaks (34)	Impacts with objects in the driveways	Body ply breakage and tire must be scrapped
	Tread separations (31)	Same as Item 1, 2, 3, and 4	
	OTHERS (75)		
L.B. ABREU's visit to El Tigre, Anzoátegui	Explorer vehicle roll over due to tread leaving casing	- Excessive speed 173 Km/Hr (26 Km in 9 Minutes) - Heavy load, 8 passengers plus luggage. - High pavement temperature (55°C at 1.20 p.m)	Tire fatigue and separations

Document 2

(REPORTE PRELIMINAR)

RESUMEN DE ESTUDIO SOBRE EXPLORER

Fuente de Información	Problema	Observaciones o Causas posibles	Resultado o Efecto posible
Evaluación de Cauchos de Explorers en servicio en las concesionarias de Maracaibo, Cabimas, Pto. Fijo y Barquisimeto 132 Cauchos Inspeccionados	Baja presión de inflado 8 cauchos = 6 %	1) Pinchazos con clavos, tornillos, vidrios y objetos metálicos. Las reparaciones podrían no ser adecuadas 4 cauchos = 3 %	Corrosión en los Alambres de Acero, lo cual produce a la larga separación y pérdida de la banda de rodamiento
		2) - Protuberancias en la costura del rim (puntos de soldadura) - Falla de válvula - Falta de mantenimiento en Presión de Inflado	Fuga progresiva del aire, lo cual favorece el aumento en la generación de calor, flexión y fatiga del caucho, induciendo las separaciones en la banda
	Cortes en la banda de rodamiento, alcanzando los Alambres de Acero 8 cauchos = 6 %	3) Impactos con objetos metálicos, vidrios y otros objetos cortantes.	Igual al Punto 1
	Baja presión de Inflado en los vehículos en exposición (22 y 26 psi)	4) - Protuberancias en la costura del rim - Baja presión de Inflado en planta Ford.	Igual al Punto 2
Encuesta hecha por BFVZ a usuarios de Explorer Total Clientes Contactados 2.183 (Satisfechos) = 1.703 78 % (Reportando Incidencias) = 486 22 %	Pinchazos (159)	Penetración por clavos, tornillos y otros objetos en las vías	Igual al Punto 1
	Ondulaciones en la Pared (64)	Ancho en los empates de tela de cuerpo	Efecto visual
	Vibraciones (63)	- Alto run out del caucho o rim - Desbalanceo del conjunto caucho/rim y/o manzana	Vibraciones del vehículo en forma horizontal y vertical entre 80 y 120 Km / Hr
	Desgaste Irregular de Banda de Rodamiento (38)	- Desbalanceo del conjunto caucho/rim y/o manzana - Desalinación del vehículo - Falta de rotación de los cauchos	Desgaste prematuro e irregular de la Banda de Rodamiento
	Caucho patina en húmedo (16)	Necesita ser investigado por las Areas Técnicas de Bridgestone Firestone y Ford	
	Ruptura por Impacto (34)	Golpe con objeto en la vía y con las aceras	Pérdida del caucho por la ruptura de las lonas (telas)
	Separación en la Banda de Rodamiento (31)	Igual que puntos # 1, 2, 3, y 4	
	Otros (75)		
Visita de L. E. Abreu a El Tigre, Estado Anzoategui	Volcamiento de vehículo por pérdida de Banda de Rodamiento	- Exceso de velocidad - 173 Km/Hr Aprox. (26 Km en 9 minutos) - Carga pesada (8 pasajeros más equipaje) - Alta temperatura del pavimento (55°C) (1.20 pm)	Fatiga del caucho y Separaciones

"Free Translation"
Document 2

RECOMMENDATIONS

(Based on investigation done in sites and surveys)

1. Send customer letters on the importance of tire inflation.

2 Request FORD Engineering to consider adopting U.S.A. inflation standards for Venezuela :

	Tire Inflation Pressure	
	Front	Rear
VENEZUELA	28 psi	26 psi
U. S. A.	30 psi	30 psi

3. Educate FORD Dealers on the importance of tire maintenance of inflation pressure and visual inspection of tires while vehicle is in service.

4. Distribute to all tire repair shops a tire repair manual for punctures.

5. Investigate with the Technicians and Development Engineers of FORD Detroit and BFS Akron / Nashville :

    Possibility of changing tread compound to improve traction and ride/handling in dry and wet pavement.

6. Improve service / communications between FIRESTONE Distributors and FORD Dealers to give better service to the final user (THE CUSTOMER)

Document 2

RECOMENDACIONES

(Basadas en las investigaciones realizadas)

1. Enviar a los usuarios de Explorer una carta donde se le explique la importancia de la presión de inflado.
   Colocar el mismo folleto en el manual del propietario de cada vehículo a vender.

2 Solicitar al Dpto. de Ingeniería de FORD, considerar adoptar la presión de inflado del caucho usada en U.S.A, para las Explores fabricadas en Venezuela

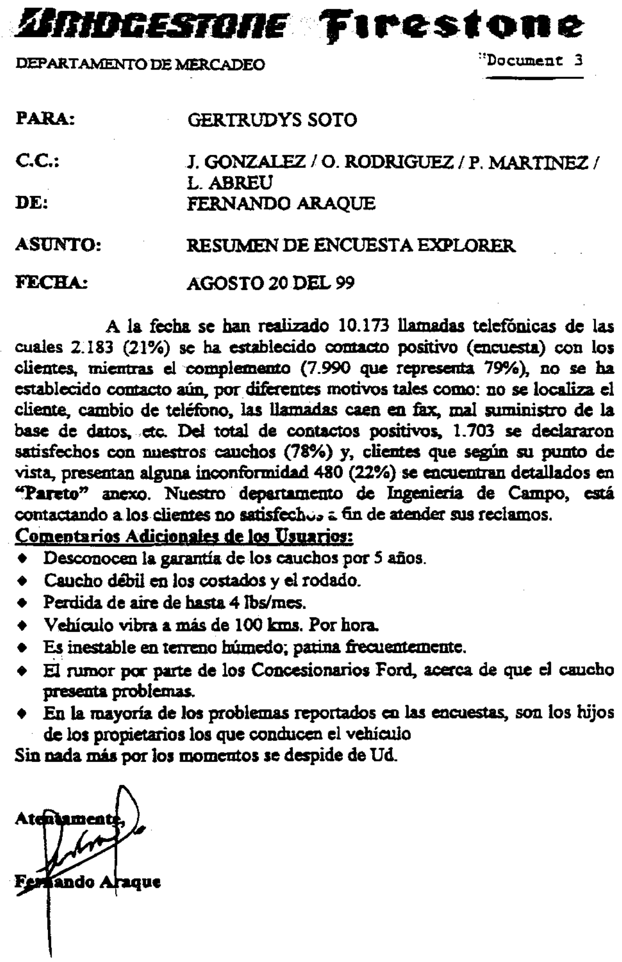
	Presión de Inflado del Caucho	
	Delantero	Trasero
VENEZUELA	28 psi	26 psi
U. S. A.	30 psi	30 psi

3. Educar a los concesionarios en la importancia de un buen mantenimiento de la presión de inflado y chequeos de los cauchos en los vehículos en servicio.

4. Distribuir en todos los establecimientos de reparación de cauchos, un folleto práctico de correcta reparación de pinchazos.

5. Investigar con los Técnicos y Desarrollo de Proceso FORD Detroit y BFS Akron / Nashville
   - Posibilidad de cambiar compuesto de rodado para mejorar tracción y manejo en pavimento seco y húmedo.

6. Mejorar el enlace entre distribuidores FIRESTONE y concesionarios con el fin de prestar un mejor servicio al usuario final.



BRIDGESTONE Firestone

DEPARTAMENTO DE MERCADEO

"Document 3

PARA: GERTRUDYS SOTO

C.C.: J. GONZALEZ / O. RODRIGUEZ / P. MARTINEZ / L. ABREU

DE: FERNANDO ARAQUE

ASUNTO: RESUMEN DE ENCUESTA EXPLORER

FECHA: AGOSTO 20 DEL 99

A la fecha se han realizado 10.173 llamadas telefónicas de las cuales 2.183 (21%) se ha establecido contacto positivo (encuesta) con los clientes, mientras el complemento (7.990 que representa 79%), no se ha establecido contacto aún, por diferentes motivos tales como: no se localiza el cliente, cambio de teléfono, las llamadas caen en fax, mal suministro de la base de datos, etc. Del total de contactos positivos, 1.703 se declararon satisfechos con nuestros cauchos (78%) y, clientes que según su punto de vista, presentan alguna inconformidad 480 (22%) se encuentran detallados en "**Pareto**" anexo. Nuestro departamento de Ingeniería de Campo, está contactando a los clientes no satisfechos a fin de atender sus reclamos.

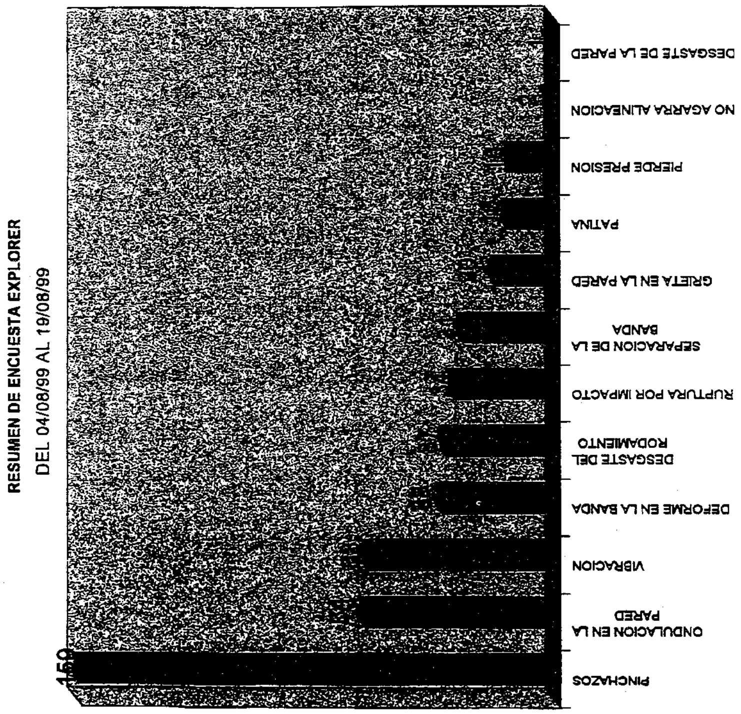
Comentarios Adicionales de los Usuarios:

- Desconocen la garantía de los cauchos por 5 años.
- Caucho débil en los costados y el rodado.
- Perdida de aire de hasta 4 lbs/mes.
- Vehículo vibra a más de 100 kms. Por hora.
- Es inestable en terreno húmedo; patina frecuentemente.
- El rumor por parte de los Concesionarios Ford, acerca de que el caucho presenta problemas.
- En la mayoría de los problemas reportados en las encuestas, son los hijos de los propietarios los que conducen el vehículo

Sin nada más por los momentos se despide de Ud.

Atentamente,

Fernando Araque



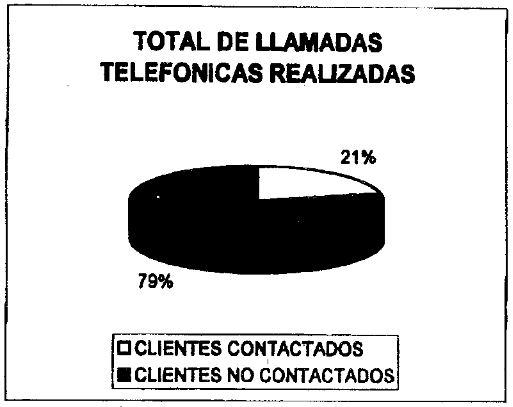
RESUMEN DE ENCUESTA EXPLORER
DEL 04/08/99 AL 19/08/99
150
PINCHAZOS
ONDULACION EN LA PARED
VIBRACION
DEFORME EN LA BANDA
DESGASTE DEL RODAMIENTO
RUPTURA POR IMPACTO
SEPARACION DE LA BANDA
GRIETA EN LA PARED
PATINA
PIERDE PRESION
NO AGARRA ALINEACION
DESGASTE DE LA PARED

Glosario de Términos del Pareto.

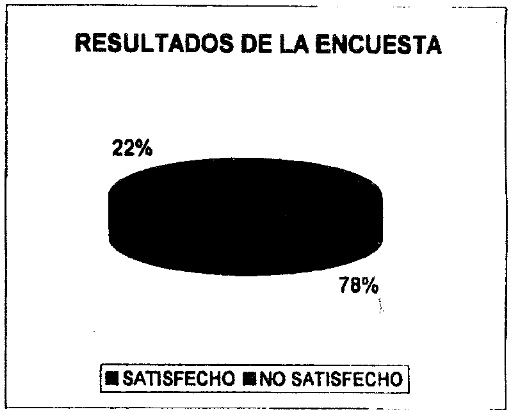
- **Pinchazos:** Objeto extraño que penetra en la superficie del neumático; Ej. Tornillos, pedazos de vidrio, clavos, etc.
- **Ondulación en la Pared:** Depresión provocada por sobre medida del empate de tela.
- **Vibración:** Irregularidad en la redondez radial que experimenta el neumático o el rim.
- **Desgaste de Rodamiento:** Provocado por problemas mecánicos del vehículo.
- **Patina:** Deslizamiento del neumático sobre pavimento húmedo.
- **Perdida de Presión:** Puede ser ocasionado por fugas de aire del neumático, rim y/o válvula.
- **Ruptura por Impacto:** Ocasionado por impacto del caucho contra objetos extraños, Ej. Pared, hueco, etc.
- **Grieta en la Pared:** Cualquier irregularidad que presente la pared del caucho, que pueda ser apreciada visualmente por el cliente.
- **Separación de Banda:** Separación entre la banda de rodamiento y/o entre estabilizadores de acero que resulta en perdida de la banda de rodamiento, quedando descubierta la carcaza del caucho.
- **Deformidad en la Banda:** Cualquier irregularidad que presenta la banda de rodamiento del caucho, que puede ser apreciada visualmente por el cliente.

RESUMEN DE ENCUESTA EXPLORER

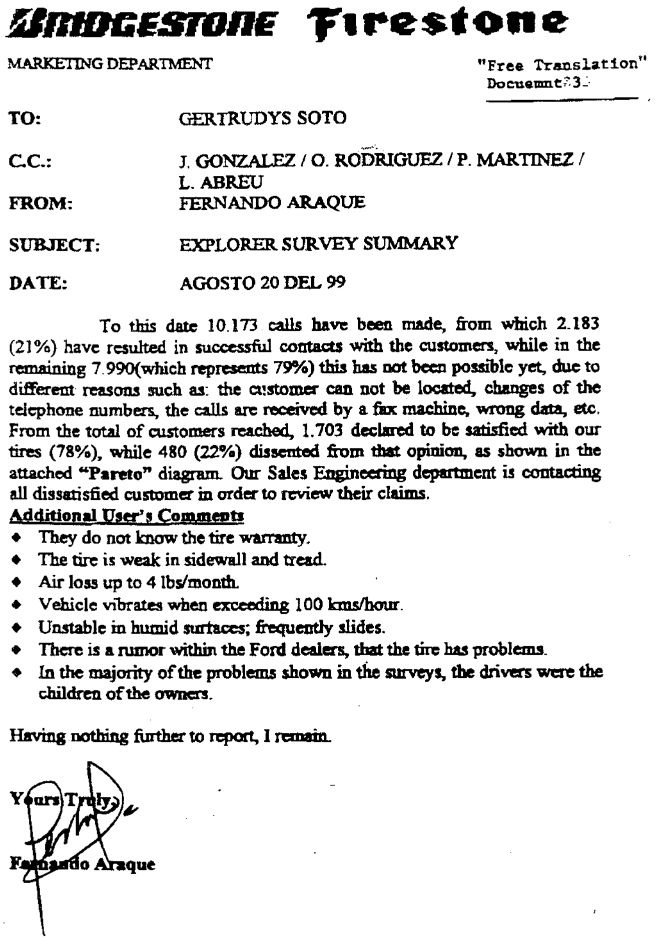
DEL 4 AL 19 DE AGOSTO DEL 99


TOTAL DE LLAMADAS TELEFONICAS REALIZADAS

CLIENTES CONTACTADOS	2.183
CLIENTES NO CONTACTADOS	7.990
TOTAL	10.173


RESULTADOS DE LA ENCUESTA

SATISFECHO	1.703
NO SATISFECHO	480
TOTAL	2.183



BRIDGESTONE Firestone

MARKETING DEPARTMENT

"Free Translation"
Docuemnt#3

TO: GERTRUDYS SOTO

C.C.: J. GONZALEZ / O. RODRIGUEZ / P. MARTINEZ / L. ABREU

FROM: FERNANDO ARAQUE

SUBJECT: EXPLORER SURVEY SUMMARY

DATE: AGOSTO 20 DEL 99

To this date 10.173 calls have been made, from which 2.183 (21%) have resulted in successful contacts with the customers, while in the remaining 7.990(which represents 79%) this has not been possible yet, due to different reasons such as: the customer can not be located, changes of the telephone numbers, the calls are received by a fax machine, wrong data, etc. From the total of customers reached, 1.703 declared to be satisfied with our tires (78%), while 480 (22%) dissented from that opinion, as shown in the attached **"Pareto"** diagram. Our Sales Engineering department is contacting all dissatisfied customer in order to review their claims.

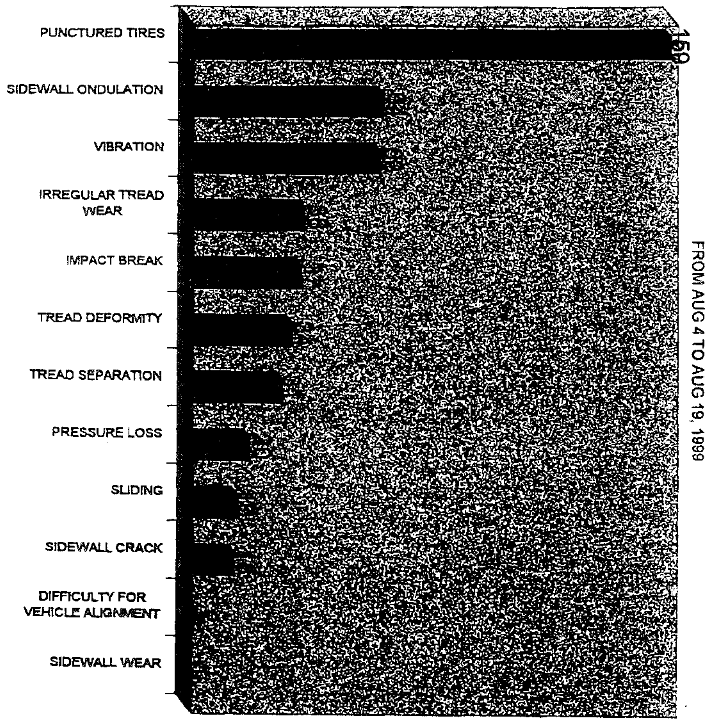
Additional User's Comments

- They do not know the tire warranty.
- The tire is weak in sidewall and tread.
- Air loss up to 4 lbs/month.
- Vehicle vibrates when exceeding 100 kms/hour.
- Unstable in humid surfaces; frequently slides.
- There is a rumor within the Ford dealers, that the tire has problems.
- In the majority of the problems shown in the surveys, the drivers were the children of the owners.

Having nothing further to report, I remain.

Yours Truly,

Fernando Araque

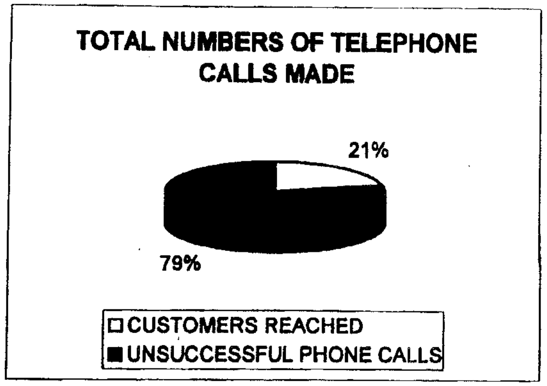


SUMMARY OF EXPLORER SURVEY
FROM AUG 4 TO AUG 19, 1999

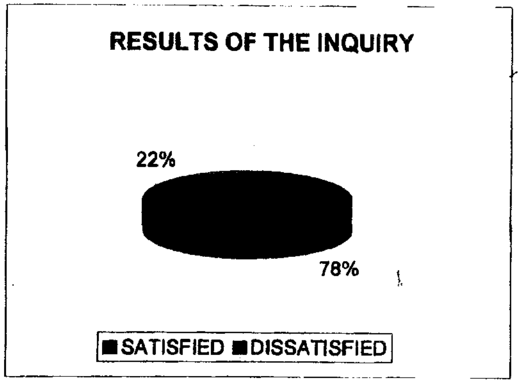
GLOSSARY OF THE PARETO TERMS

- **Punctured Tires:** Foreign object which penetrates the surfaces of the tire: i.e.: screws, piece of glass, nails, etc.
- **Sidewall Ondulation:** Depression caused by the superimposition of the jointure of a very long piece of material.
- **Vibration:** Irregularity in the radial roundness experienced by the tire or the rim.
- **Irregular Tread Wear:** Caused by mechanical problems of the vehicle.
- **Sliding:** Sliding of the tire on wet pavement.
- **Pressure Loss:** May be due to air leakage of the tire, rim and/or valve.
- **Impact Break:** Produced by the impact of the tire against outside objects.
- **Sidewall Crack:** Any irregularity shown in the tire sidewall, that may be visually appreciated by the customer.
- **Tread Separation:** Separation between the tread and/or between the steel stabilizers which results in tread loss and the exposure of tire carcass.
- **Tread Deformity:** Any irregularity shown by the tire tread, which can be visually appreciated by the customer.

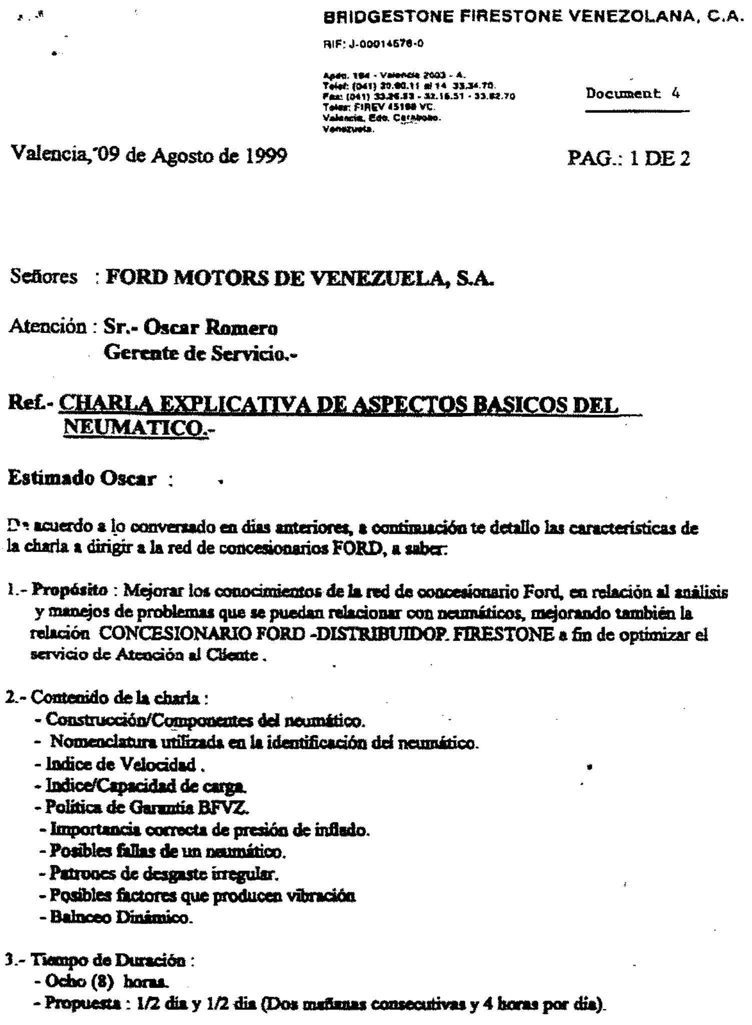
SUMMARY OF EXPLORER SURVEY
FROM AUG. 4 TO AUG. 19, 1999



CUSTOMERS REACHED	2.183
UNSUCCESSFUL PHONE CALLS	7.990
TOTAL	10.173



SATISFIED	1.703
DISSATISFIED	480
TOTAL	2.183



BRIDGESTONE FIRESTONE VENEZOLANA, C.A.
RIF: J-00014676-0

Apdo. 184 - Valencia 2003 - A.
Telef: (041) 30.90.11 al 14 33.34.70.
Fax: (041) 33.26.53 - 32.16.51 - 33.82.70
Telex: FIREV 45188 VC.
Valencia, Edo. Carabobo.
Venezuela.

Document 4

Valencia,'09 de Agosto de 1999

PAG.: 1 DE 2

Señores : **FORD MOTORS DE VENEZUELA, S.A.**

Atención : **Sr.- Oscar Romero**
Gerente de Servicio.-

Ref.- CHARLA EXPLICATIVA DE ASPECTOS BASICOS DEL NEUMATICO.-

Estimado Oscar :

De acuerdo a lo conversado en días anteriores, a continuación te detallo las características de la charla a dirigir a la red de concesionarios FORD, a saber:

1.- **Propósito** : Mejorar los conocimientos de la red de concesionario Ford, en relación al análisis y manejos de problemas que se puedan relacionar con neumáticos, mejorando también la relación CONCESIONARIO FORD -DISTRIBUIDOR FIRESTONE a fin de optimizar el servicio de Atención al Cliente.

2.- Contenido de la charla :
- Construcción/Componentes del neumático.
- Nomenclatura utilizada en la identificación del neumático.
- Indice de Velocidad.
- Indice/Capacidad de carga.
- Política de Garantía BFVZ.
- Importancia correcta de presión de inflado.
- Posibles fallas de un neumático.
- Patrones de desgaste irregular.
- Posibles factores que producen vibración
- Balnceo Dinámico.

3.- Tiempo de Duración :
- Ocho (8) horas.
- Propuesta : 1/2 día y 1/2 día (Dos mañanas consecutivas y 4 horas por día).

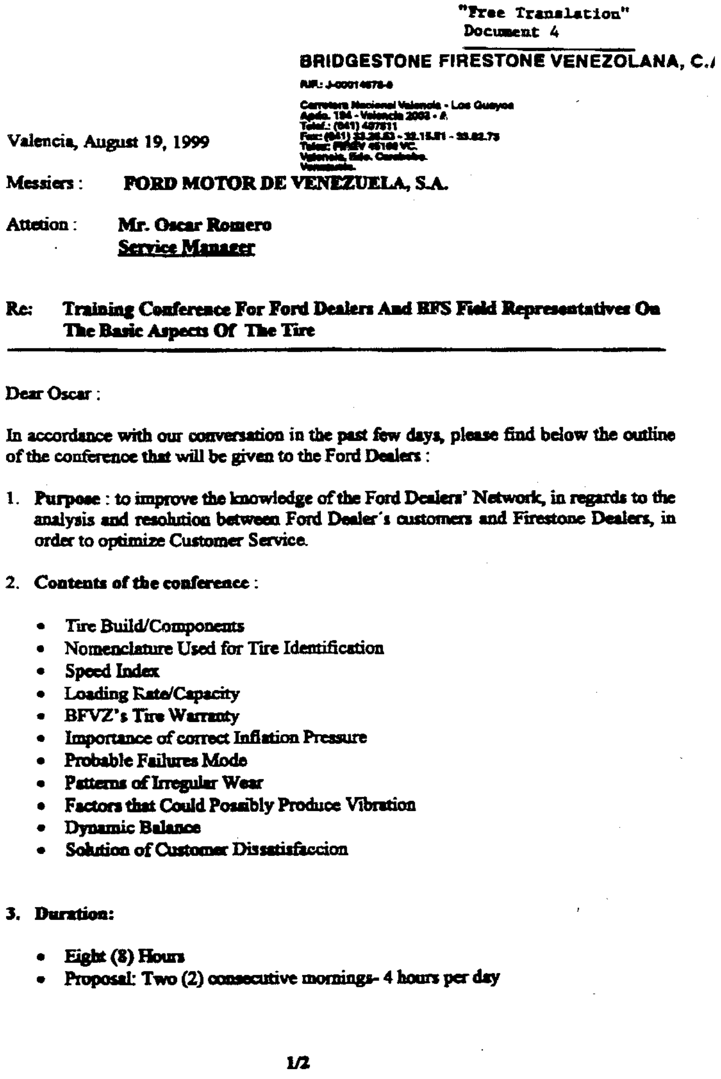
Durante el segundo día se hará una dinámica de trabajo entre el Concesionario Ford y el Distribuidor Bridgestone Firestone. En esta actividad participarán el Asesor Técnico y el Gerente de la zona de nuestra oficina de Atención al Cliente para crear un canal de comunicación directo entre ambas partes, con el fin de mejorar el tiempo de respuesta al cliente y por ende mejorar el servicio.

Sin otro particular y esperando de su respuesta a fin de desarrollar esta actividad en la brevedad posible, le saluda.

Atentamente,

Pedro Martínez
Gerente de Venta Equipo Original

C.C.: Srs.- Hector Rodríguez - FORD
Antonio Da silva - FORD
Carlos Maron - FORD
Edivia Caballero - FORD
Jorge González - BFVZ
Oscar Rodríguez - BFVZ
Gertrudis Soto - BFVZ



"Free Translation"
Document 4

BRIDGESTONE FIRESTONE VENEZOLANA, C.
RIF: J-00014678-6

Carretera Nacional Valencia - Los Guayos
Apdo. 194 - Valencia 2003 - A
Telef.: (041) 497811
Fax: (041) 33.26.63 - 33.15.81 - 33.82.73
Telex: FIRSV 45166 VC.
Valencia, Edo. Carabobo.
Venezuela.

Valencia, August 19, 1999

Messiers : **FORD MOTOR DE VENEZUELA, S.A.**

Attetion : **Mr. Oscar Romero**
Service Manager

Re: Training Conference For Ford Dealers And BFS Field Representatives On The Basic Aspects Of The Tire

Dear Oscar :

In accordance with our conversation in the past few days, please find below the outline of the conference that will be given to the Ford Dealers :

1. **Purpose** : to improve the knowledge of the Ford Dealers' Network, in regards to the analysis and resolution between Ford Dealer's customers and Firestone Dealers, in order to optimize Customer Service.

2. **Contents of the conference** :

   - Tire Build/Components
   - Nomenclature Used for Tire Identification
   - Speed Index
   - Loading Rate/Capacity
   - BFVZ's Tire Warranty
   - Importance of correct Inflation Pressure
   - Probable Failures Mode
   - Patterns of Irregular Wear
   - Factors that Could Possibly Produce Vibration
   - Dynamic Balance
   - Solution of Customer Dissatisfaccion

3. **Duration:**

   - Eight (8) Hours
   - Proposal: Two (2) consecutive mornings- 4 hours per day

1/2

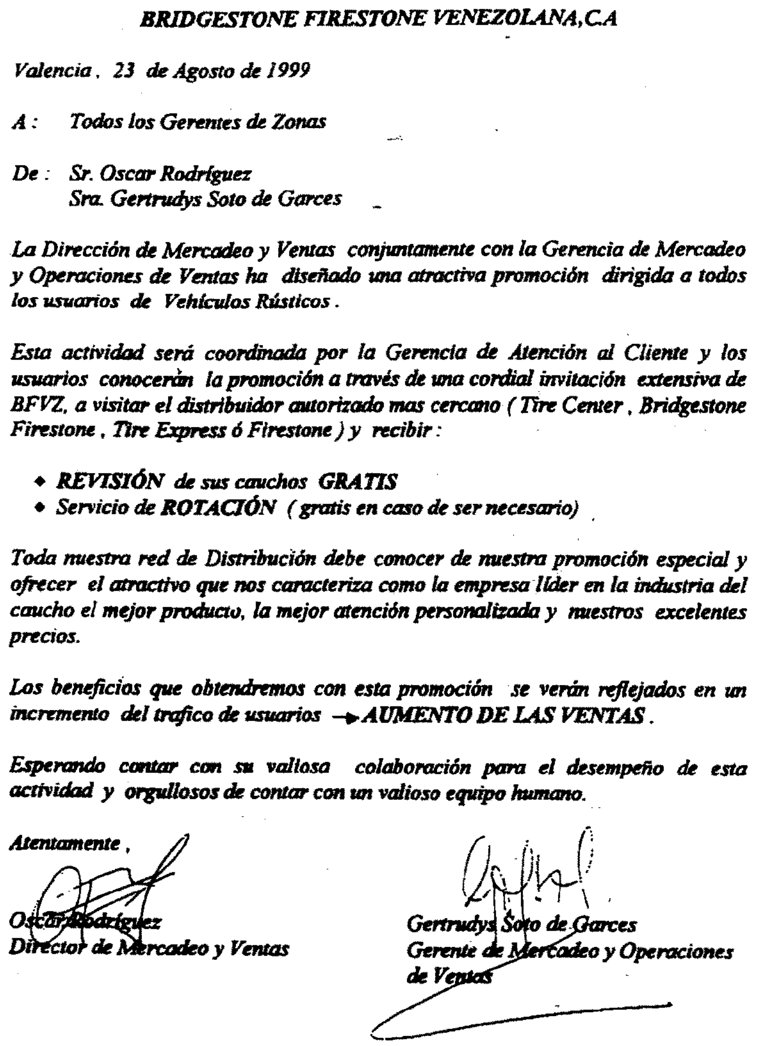
During the second day a work session will be conducted with the Ford Dealer and the Bridgestone Firestone Dealer and the Zone Manager of our Customer Service Office Will participate in this activity in order to create a channel of direct communication on both sides, to improve the response time to the customer, thus improving the service.

Having nothing further to inform and hoping to hear from you soon to the end of implementing this activity the earliest possible, I remain.

Your Truly

Pedro Martínez
Original Equipment Manager

c.c.: Messrs : **Hector Rodriguez - FORD**
Antonio Da silva - FORD
Carlos Maron - FORD
Edivia Caballero - FORD
Jorge González - BFVZ
Oscar Rodríguez - BFVZ
Gertrudis Soto - BFVZ



BRIDGESTONE FIRESTONE VENEZOLANA,C.A

Valencia , 23 de Agosto de 1999

A : Todos los Gerentes de Zonas

De : Sr. Oscar Rodríguez
Sra. Gertrudys Soto de Garces

La Dirección de Mercadeo y Ventas conjuntamente con la Gerencia de Mercadeo y Operaciones de Ventas ha diseñado una atractiva promoción dirigida a todos los usuarios de Vehículos Rústicos .

Esta actividad será coordinada por la Gerencia de Atención al Cliente y los usuarios conocerán la promoción a través de una cordial invitación extensiva de BFVZ, a visitar el distribuidor autorizado mas cercano (Tire Center , Bridgestone Firestone , Tire Express ó Firestone) y recibir :

- ***REVISIÓN** de sus cauchos **GRATIS***
- *Servicio de **ROTACIÓN** (gratis en caso de ser necesario)*

Toda nuestra red de Distribución debe conocer de nuestra promoción especial y ofrecer el atractivo que nos caracteriza como la empresa líder en la industria del caucho el mejor producto, la mejor atención personalizada y nuestros excelentes precios.

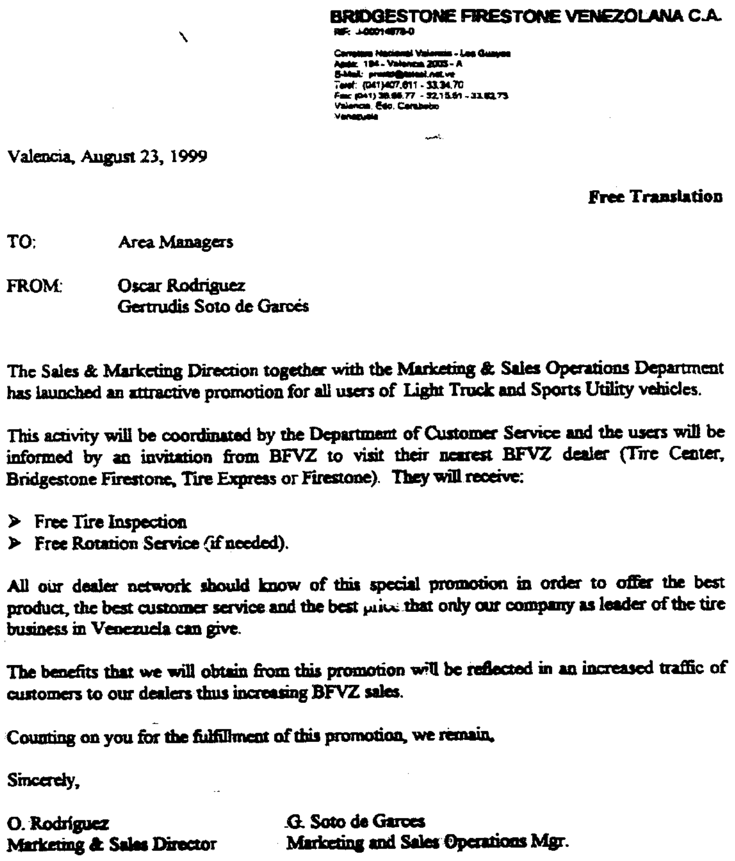
Los beneficios que obtendremos con esta promoción se verán reflejados en un incremento del trafico de usuarios → AUMENTO DE LAS VENTAS .

Esperando contar con su valiosa colaboración para el desempeño de esta actividad y orgullosos de contar con un valioso equipo humano.

Atentamente ,

Oscar Rodríguez
Director de Mercadeo y Ventas

Gertrudys Soto de Garces
Gerente de Mercadeo y Operaciones de Ventas



BRIDGESTONE FIRESTONE VENEZOLANA C.A.
RIF: J-[illegible]-0

Carretera Nacional Valencia - Los Guayos
Apdo. 194 - Valencia 2003 - A
E-Mail: [illegible]
Telef: (041)407.611 - 33.34.70
Fax: (041) 38.66.77 - 32.15.61 - 33.62.73
Valencia, Edo. Carabobo
Venezuela

Valencia, August 23, 1999

Free Translation

TO: Area Managers

FROM: Oscar Rodriguez
Gertrudis Soto de Garcés

The Sales & Marketing Direction together with the Marketing & Sales Operations Department has launched an attractive promotion for all users of Light Truck and Sports Utility vehicles.

This activity will be coordinated by the Department of Customer Service and the users will be informed by an invitation from BFVZ to visit their nearest BFVZ dealer (Tire Center, Bridgestone Firestone, Tire Express or Firestone). They will receive:

- Free Tire Inspection
- Free Rotation Service (if needed).

All our dealer network should know of this special promotion in order to offer the best product, the best customer service and the best price that only our company as leader of the tire business in Venezuela can give.

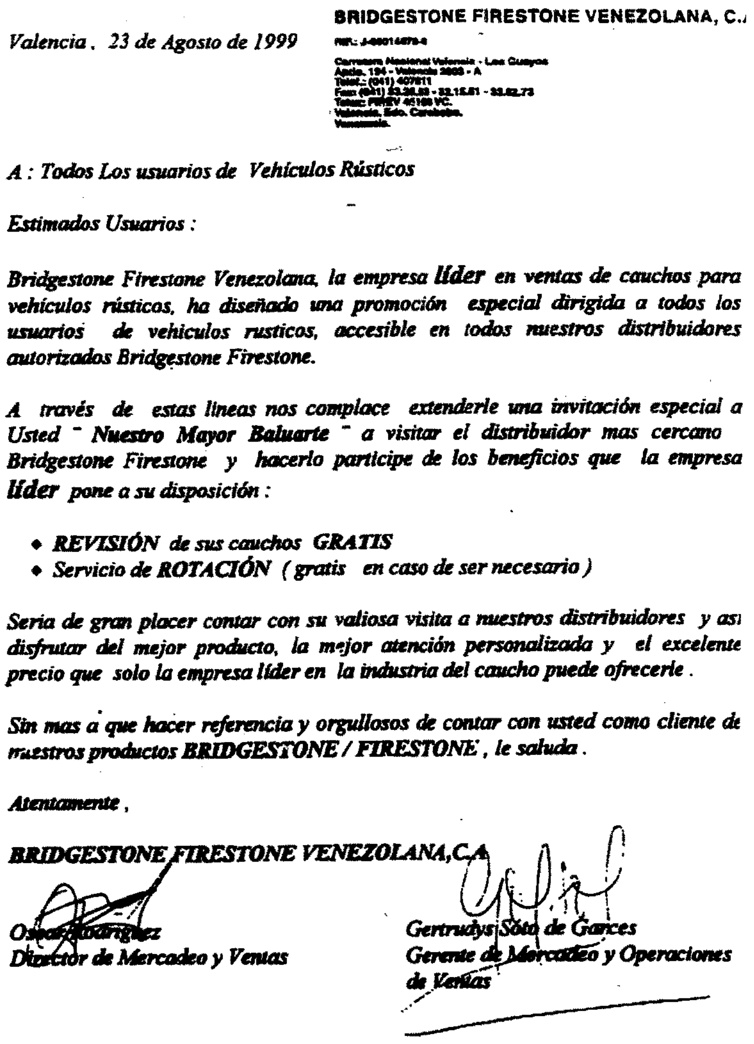
The benefits that we will obtain from this promotion will be reflected in an increased traffic of customers to our dealers thus increasing BFVZ sales.

Counting on you for the fulfillment of this promotion, we remain,

Sincerely,

O. Rodriguez
Marketing & Sales Director

G. Soto de Garces
Marketing and Sales Operations Mgr.



BRIDGESTONE FIRESTONE VENEZOLANA, C.A
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Telef.: (041) 407611
Fax: (041) [illegible]
Telex: [illegible]
Valencia, Edo. Carabobo.
Venezuela.

Valencia, 23 de Agosto de 1999

A : Todos Los usuarios de Vehículos Rústicos

Estimados Usuarios :

*Bridgestone Firestone Venezolana, la empresa **líder** en ventas de cauchos para vehículos rústicos, ha diseñado una promoción especial dirigida a todos los usuarios de vehiculos rusticos, accesible en todos nuestros distribuidores autorizados Bridgestone Firestone.*

*A través de estas lineas nos complace extenderle una invitación especial a Usted " **Nuestro Mayor Baluarte** " a visitar el distribuidor mas cercano Bridgestone Firestone y hacerlo participe de los beneficios que la empresa **líder** pone a su disposición :*

- ***REVISIÓN** de sus cauchos **GRATIS***
- *Servicio de **ROTACIÓN** (gratis en caso de ser necesario)*

Seria de gran placer contar con su valiosa visita a nuestros distribuidores y asi disfrutar del mejor producto, la mejor atención personalizada y el excelente precio que solo la empresa líder en la industria del caucho puede ofrecerle .

*Sin mas a que hacer referencia y orgullosos de contar con usted como cliente de nuestros productos **BRIDGESTONE / FIRESTONE** , le saluda .*

Atentamente ,

BRIDGESTONE FIRESTONE VENEZOLANA,C.A

Oscar Rodríguez
Director de Mercadeo y Ventas

Gertrudys Soto de Garces
Gerente de Mercadeo y Operaciones de Ventas

BRIDGESTONE FIRESTONE VENEZOLANA C.A.
RIF. J-00014878-0

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Telef: (041)407.811 - 33.34.70
Fax: (041) 38.55.77 - 32.15.51 - 33.62.72
Valencia, Edo. Carabobo
Venezuela

Valencia, August 23, 1999

Free Translation

TO: Owners of Light Truck Vehicles

Dear Customer:

Bridgestone Firestone Venezolana, the Venezuelan leader in sales of light truck and sports Utility tires is launching a special promotion for all customers, available at all our authorized Bridgestone Firestone dealers.

We will like to extend a special invitation to you, our special customer, to visit your nearest BFVZ dealer and take advantage of the benefits of this promotion:

- ➢ Free Tire Inspection.
- ➢ Free Rotation Service (if needed).

It will be a pleasure to count with your visit to one of our dealers so that you can enjoy the best product, the best customer service and the excellent prices that only our company as leader of the tire business in Venezuela can offer you.

Looking forward to counting with you as our preferred customer, we remain,

Sincerely,
Bridgestone Firestone Venezolana C.A.
signed by:

Oscar Rodriguez	Gertrudis Soto de Garcés
Sales & Marketing Director	Marketing and Sales Operations Mgr.

CONFIDENTIAL
ENTIRE PAGE

Firestone

1999 QUARTERLY MEETING
AIKEN, SC
OCTOBER 19, 1999

CRITICAL PERFORMANCE ISSUES

ADJUSTMENT ANALYSIS - 1999 VS 1998 3RD QTR

FIRESTONE LIGHT TRUCK - RECREATIONAL
- BY SERVICE GROUP -

O.A. LTR SALES - UP 21.8%
DEALER SALES - UP 20.4%
DEALER ADJ - UP 16.3%

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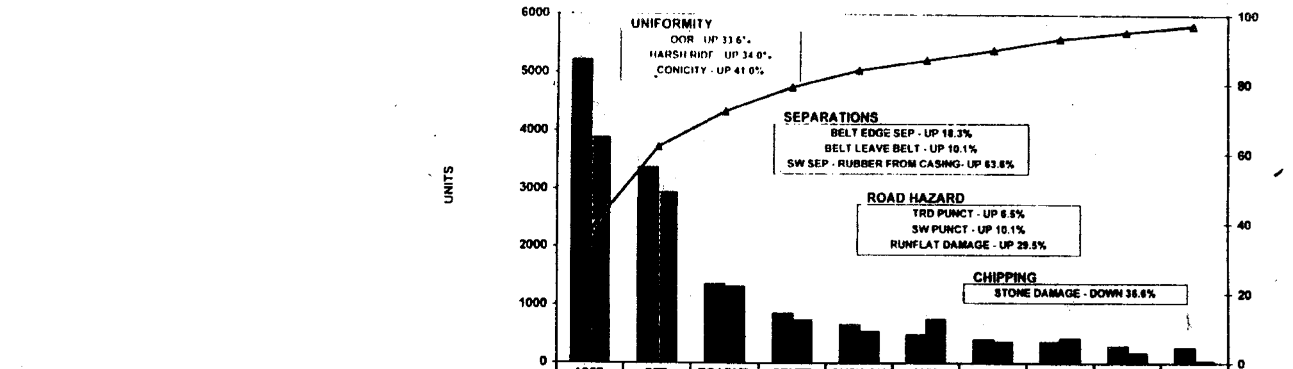

UNIFORMITY
OOR - UP 33.6%
HARSH RIDE - UP 34.0%
CONICITY - UP 41.0%

SEPARATIONS
BELT EDGE SEP - UP 18.3%
BELT LEAVE BELT - UP 10.1%
SW SEP - RUBBER FROM CASING - UP 63.6%

ROAD HAZARD
TRD PUNCT - UP 6.5%
SW PUNCT - UP 10.1%
RUNFLAT DAMAGE - UP 29.5%

CHIPPING
STONE DAMAGE - DOWN 36.6%

	UNIF	SEP	ROADHZ	OTHER	SHSWCK	CHIP	FACTRY	IRRGWR	RAPDWR	DISCLR
▬ CURRENT	5206	3365	1365	863	672	489	417	372	301	270
▬ PREVIOUS	3878	2929	1323	738	552	766	372	429	173	45
%CHG	34.2	14.9	3.2	16.9	21.7	-36.2	12.1	-13.3	74	500
CURR $/ADJ	$74.87	$37.70	$25.82	$54.29	$40.22	$40.59	$64.79	$33.27	$24.97	$54.28
PREV $/ADJ	$70.05	$37.93	$30.76	$53.33	$38.93	$55.88	$64.77	$35.83	$27.16	$63.70
─▲─ % OF TOTAL	38	62	72	79	84	87	90	93	95	97

NO STORE OR SALE ADJUSTMENTS.

CURRENT	13715	$723,904
PREVIOUS	11796	$597,951

ADJUSTMENT ANALYSIS - 1999 VS 1998 3RD QTR
FIRESTONE LIGHT TRUCK - RECREATIONAL
- BY PATTERN -

O.A. LTR SALES - UP 21.8%
DEALER SALES - UP 20.4%
DEALER ADJ - UP 16.3%

CONFIDENTIAL
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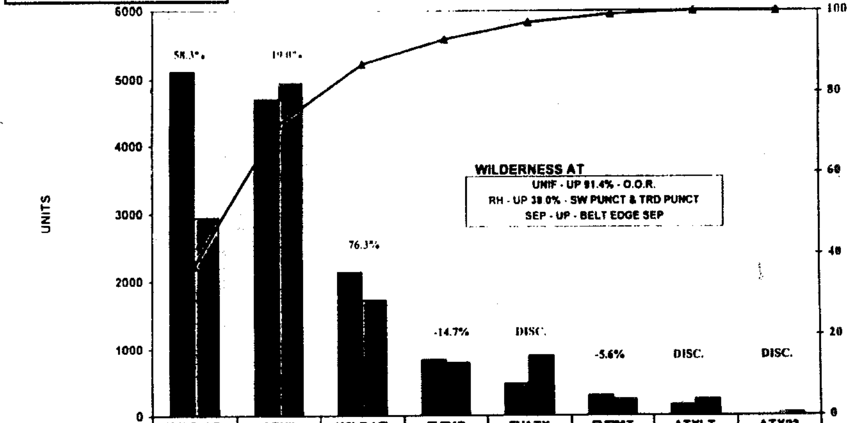

WILDERNESS AT
UNIF - UP 91.4% - O.O.R.
RH - UP 38.0% - SW PUNCT & TRD PUNCT
SEP - UP - BELT EDGE SEP

	WILD-AT	ATXII	WILD-HT	FHR4S	FHATX	FHRMT	ATXLT	ATX23
▬ CURRENT	5115	4698	2144	833	473	287	163	2
▬ PREVIOUS	2946	4942	1726	785	880	248	241	28
%CHG	73.6	-4.9	24.2	6.1	-46.3	15.7	-32.4	-92.9
—▲— % OF TOTAL	37	72	87	93	97	99	100	100

NO STORE OR SALE ADJUSTMENTS.

CURRENT	13715	$723,984
PREVIOUS	11796	$597,951

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FIRESTONE
LT RECREATIONAL ADJUSTMENT ANALYSIS
1999 FIRST HALF YEAR

JULY 1999

OVERALL BFS DOLLAR ADJUSTMENTS

-'99 HALF COMPARED TO '98 HALF-

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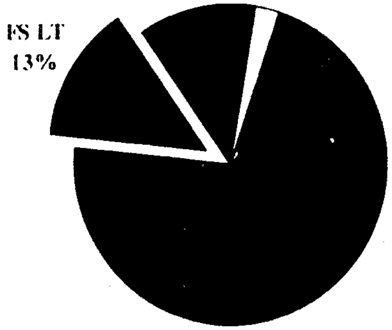
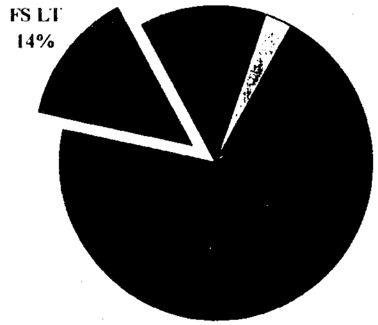
BY PRODUCT GROUP





FIRESTONE LT DOLLARS
ADJUSTMENTS UP 19 %

1999 1st HALF DOLLARS ADJUSTED
TOTAL DOLLARS = $1,155,706
W/O FORD RECALL

1998 1st HALF DOLLARS ADJUSTED
TOTAL DOLLARS = $970,659
W/O FORD RECALL

INCLUDES DEALER AND STORE ONLY

OVERALL BFS UNIT ADJUSTMENTS

-'99 HALF COMPARED TO '98 HALF

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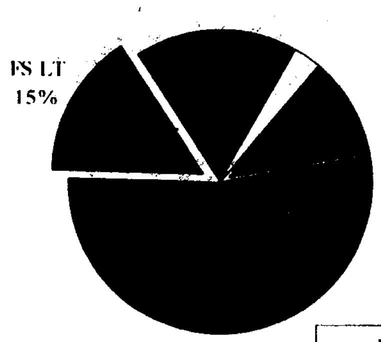
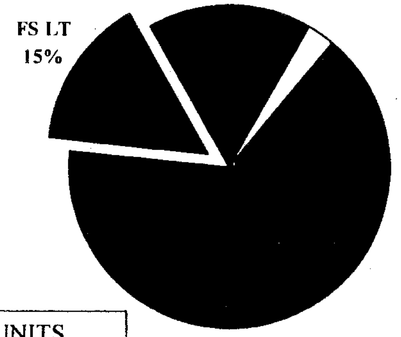
BY PRODUCT GROUP



1999 1st HALF UNITS ADJUSTED
TOTAL UNITS = 20,604
W/O FORD RECALL

FIRESTONE LT UNITS
ADJUSTMENTS UP 7 %



1998 1st HALF UNITS ADJUSTED
TOTAL UNITS = 19,262
W/O FORD RECALL

INCLUDES DEALER AND STORE ONLY

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SUMMARY
FIRESTONE LT RECREATIONAL - 1999 FIRST HALF YEAR

CHANGE	DESCRIPTION	1999	1998
↑ 18.1%	OVERALL ADJ. - DOLLARS	$ 764,457	$ 647,211
↑ 1.9%	OVERALL ADJ. - UNITS	14570	14303
↓ 13.0%	ADJ. AS % OF SALES DOLLARS (ADJ. DOLLARS / SALES DOLLARS	0.36	0.41
↓ 21.8%	ADJ. AS % OF SALES UNITS (ADJ. UNITS / SALES UNITS)	0.30	0.38
↑ 0.6%	COST / ADJ.** (ADJ. DOLLARS / ADJ. UNITS)	$ 51.94	$ 51.65

** BASED UPON DEALER ADJUSTMENTS ONLY; STORES PAID BUDGET AMOUNT.

ADJUSTMENT PERFORMANCE - SERVICE GROUP

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SERVICE GROUP	% CHANGE	COMMENTS
UNIFORMITY	↑ 36.6%	148 PROCESS IMPROVEMENT – REVISED UNIFORMITY LIMITS –HIGH POST PRODUCT IMPRV. NUMBERS
SEPARATIONS	↑ 18.6%	426 PROCESS IMPROVEMENT FOR LT265/75R16, 366 FOR OTHERS NEED MORE IMPROVEMENT
ROAD HAZARD	↑ 2.0%	CUSTOMER SATISFACTION BALANCED WITH COST CONTROL
CHIPPING	↓ 37.3%	DECREASE IN WILDERNESS AT AND WILDERNESS HT – NEW SPECIAL SERVICE TIRES AVAILABLE

NEED IMPROVEMENT IN UNIFORMITY AND MORE IMPROVEMENT IN SEPARATIONS TO REDUCE LT REC ADJUSTMENTS.

CONFIDENTIAL
ENTIRE PAGE

ADJUSTMENT PERFORMANCE - MAJOR LINES

TIRE LINE	MAJOR REASON FOR REMOVAL	COMMENTS
ATX II	SEPARATIONS UNIFORMITY	SEPARATIONS UP 5.2% - 25 PPI UNIFORMITY DOWN 4.1%
WILDERNESS AT	UNIFORMITY ROAD HAZARD	UNIFORMITY UP 99.4% ROAD HAZARD UP 42.5%
WILDERNESS HT	UNIFORMITY ROAD HAZARD	UNIFORMITY UP 78.9% ROAD HAZARD DOWN 1.1%

WILDERNESS AT & WILDERNESS HT INCREASES
IN ADJUSTMENTS RELATED TO FORD F150 SIZES

ADJUSTMENT ANALYSIS - 1999 VS 1998 HALF YEAR

FIRESTONE LIGHT TRUCK - RECREATIONAL
- BY SERVICE GROUP -

CONFIDENTIAL
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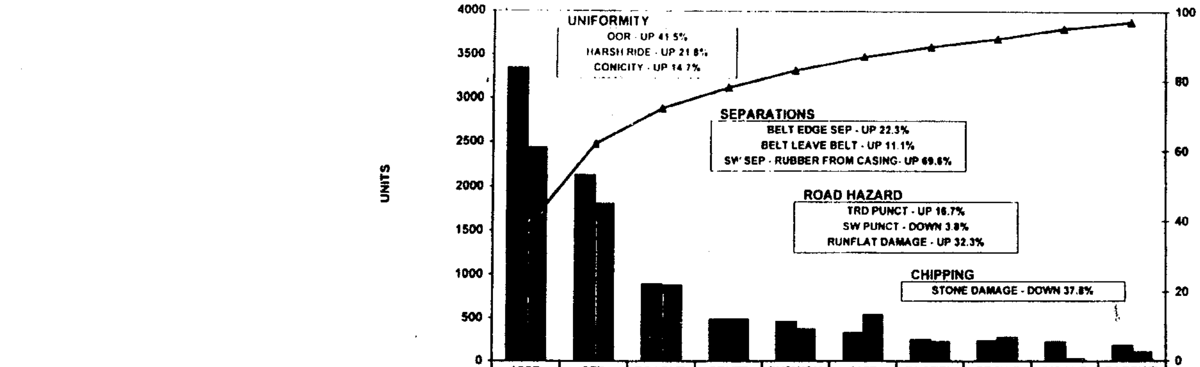
O.A. LTR SALES - UP 30,3%
DEALER SALES - UP 12.6%
DEALER ADJ - UP 16.7%



	UNIF	SEP	ROADHZ	OTHER	SHSWCK	CHIP	FACTRY	IRRGWR	DISCLR	RAPDWR
CURRENT	3338	2129	898	491	459	334	247	231	218	179
PREVIOUS	2443	1796	880	483	373	533	225	270	24	105
%CHG	36.6	18.6	2	1.7	23.1	-37.3	9.8	-14.4	808.3	70.5
CURR $/ADJ	$73.61	$37.45	$25.59	$56.56	$38.41	$38.17	$64.13	$34.09	$54.97	$21.95
PREV $/ADJ	$70.77	$38.43	$32.07	$54.48	$39.71	$59.27	$64.72	$36.93	$62.30	$30.78
% OF TOTAL	38	62	72	78	83	87	90	92	95	97

NO STORE OR SALE ADJUSTMENTS.

CURRENT	8795	$456,816
PREVIOUS	7539	$389,426

ADJUSTMENT ANALYSIS - 1999 VS 1998 HALF YEAR

FIRESTONE LIGHT TRUCK - RECREATIONAL

- BY PATTERN -

O.A. LTR SALES - UP 30.3%
DEALER SALES - UP 12.6%
DEALER ADJ - UP 16.7%

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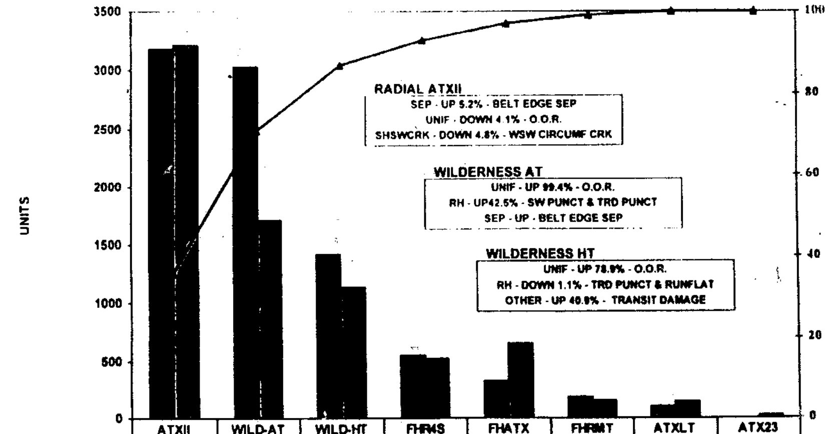


	ATXII	WILD-AT	WILD-HT	FHR4S	FHATX	FHRMT	ATXLT	ATX23
▬ CURRENT	3182	3029	1420	551	321	184	106	2
▬ PREVIOUS	3218	1714	1132	514	648	156	137	20
%CHG	-1.1	76.7	25.4	7.2	-50.5	17.9	-22.6	-90
—▲— % OF TOTAL	36	71	87	93	97	99	100	100

NO STORE OR SALE ADJUSTMENTS.

CURRENT	8796	$456,816
PREVIOUS	7539	$389,426

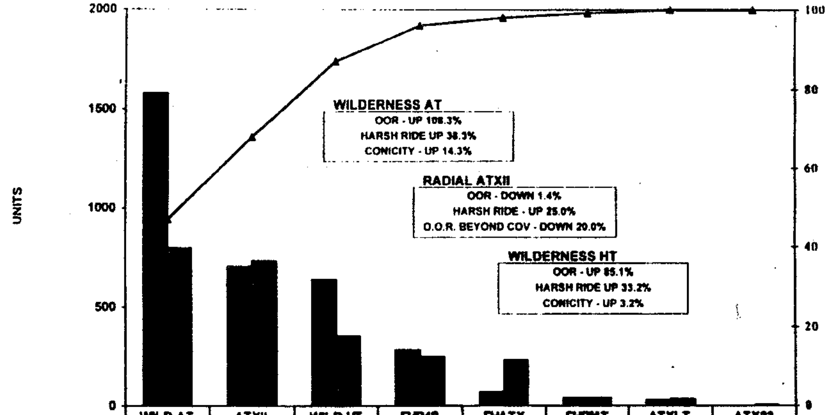
ADJUSTMENT ANALYSIS - 1999 VS 1998 HALF YEAR

FIRESTONE LIGHT TRUCK - RECREATIONAL
- UNIFORMITY -

DEALER SALES - UP 12.6%
DEALER ADJ UP 16.7%
DEALER UNIF ADJ - UP 36.6%

DEALER UNIF ADJ
OOR - U[illegible]
HARSH RIDE [illegible]
CONICITY - UP 14.7%

CONFIDENTIAL
ENTIRE PAGE



WILDERNESS AT
OOR - UP 108.3%
HARSH RIDE UP 38.3%
CONICITY - UP 14.3%

RADIAL ATXII
OOR - DOWN 1.4%
HARSH RIDE - UP 25.0%
O.O.R. BEYOND COV - DOWN 20.0%

WILDERNESS HT
OOR - UP 85.1%
HARSH RIDE UP 33.2%
CONICITY - UP 3.2%

	WILD-AT	ATXII	WILD-HT	FHR4S	FHATX	FHRMT	ATXLT	ATX23
■ CURRENT	1581	702	635	283	69	38	30	0
■ PREVIOUS	793	732	355	251	231	43	34	4
%CHG	99.4	-4.1	78.9	12.7	-70.1	-11.6	-11.8	0
—▲— % OF TOTAL	47	68	87	96	98	99	100	100

NO STORE OR SALE ADJUSTMENTS.

CURRENT 3338
PREVIOUS 2443

ADJUSTMENT ANALYSIS - 1999 VS 1998 HALF YEAR

FIRESTONE LIGHT TRUCK - RECREATIONAL
- UNIFORMITY - POST DOT 148 -

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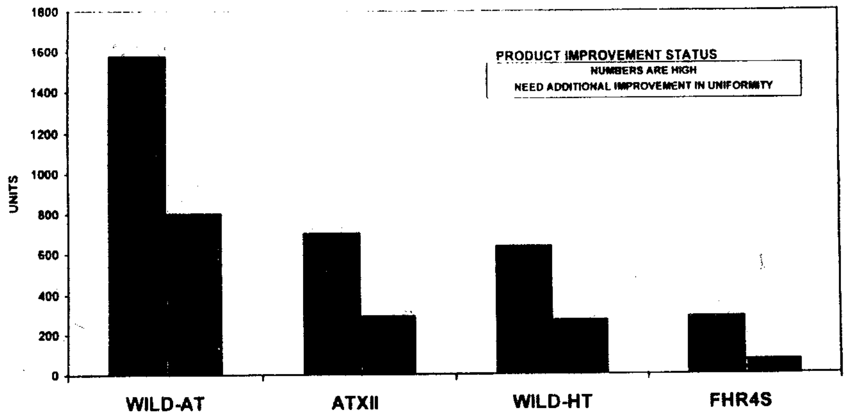

	WILD-AT	ATXII	WILD-HT	FHR4S
■ ADJ	1581	702	636	283
■ PPI	800	289	268	67
%PPI	51%	41%	42%	24%

NO STORE OR SALE ADJUSTMENTS.

ADJUSTMENT ANALYSIS - 1999 VS 1998 HALF YEAR

FIRESTONE LIGHT TRUCK - RECREATIONAL

- SEPARATIONS -

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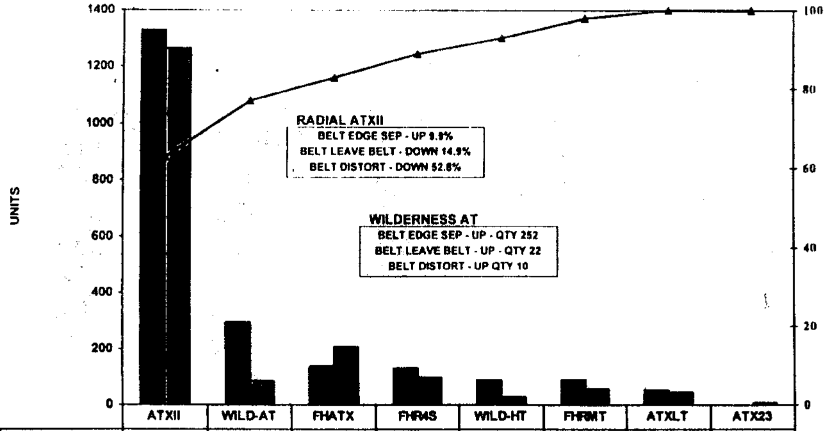
DEALER SALES - UP 12.6%
DEALER ADJ UP 16.7%
DEALER SEP ADJ - UP 18.6%

DEALER SEP ADJ
BELT EDGE SEP - UP 22.1%
BELT LEAVE BELT - UP 11.1%



RADIAL ATXII
BELT EDGE SEP - UP 9.9%
BELT LEAVE BELT - DOWN 14.9%
BELT DISTORT - DOWN 52.8%

WILDERNESS AT
BELT EDGE SEP - UP - QTY 252
BELT LEAVE BELT - UP - QTY 22
BELT DISTORT - UP QTY 10

	ATXII	WILD-AT	FHATX	FHR4S	WILD-HT	FHRMT	ATXLT	ATX23
▬ CURRENT	1333	296	138	129	91	90	52	0
▬ PREVIOUS	1267	86	205	98	27	58	46	8
%CHG	5.2	244.2	-32.7	31.6	237	55.2	13	0
—▲— % OF TOTAL	63	77	83	89	93	98	100	100

NO STORE OR SALE ADJUSTMENTS.

CURRENT	2129
PREVIOUS	1795

ADJUSTMENT ANALYSIS - 1999 VS 1998 HALF YEAR

FIRESTONE LIGHT TRUCK - RECREATIONAL

- SEPARATIONS - POST DOT 366 & POST DOT 426 LT265/75R16

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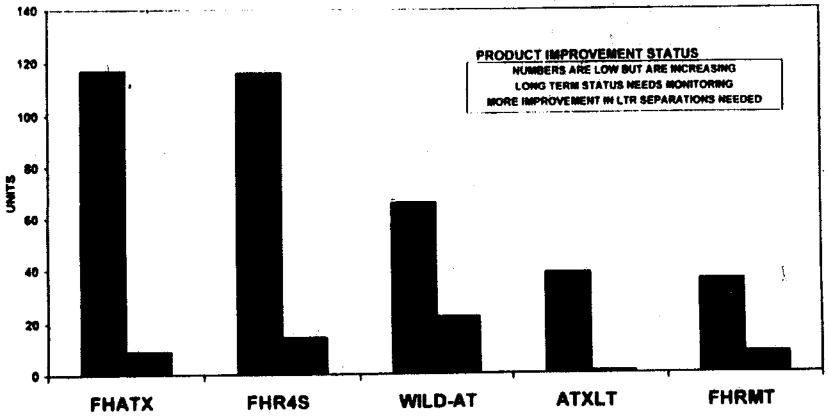

PRODUCT IMPROVEMENT STATUS
NUMBERS ARE LOW BUT ARE INCREASING
LONG TERM STATUS NEEDS MONITORING
MORE IMPROVEMENT IN LTR SEPARATIONS NEEDED

	FHATX	FHR4S	WILD-AT	ATXLT	FHRMT
■ ADJ	117	116	68	39	36
■ PPI	9	14	22	1	8
%PPI	8%	12%	33%	3%	22%

NO STORE OR SALE ADJUSTMENTS.

ADJUSTMENT ANALYSIS - 1999 VS 1998 HALF YEAR

FIRESTONE LIGHT TRUCK - RECREATIONAL
- ROAD HAZARD -

DEALER SALES - UP 12.6%
DEALER ADJ - UP16.7%
DEALER ROADHZ ADJ - UP 2.0%

DEALER ROADHZ ADJ
TRD PUNC[illegible]
SW PUNCT - [illegible]
RUNFLAT DAMAGE - UP 32.3%

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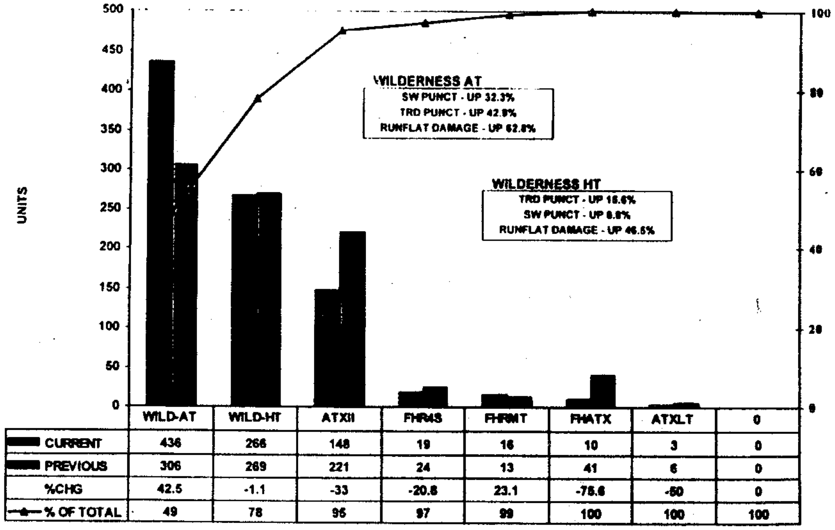

WILDERNESS AT
SW PUNCT - UP 32.3%
TRD PUNCT - UP 42.8%
RUNFLAT DAMAGE - UP 62.8%

WILDERNESS HT
TRD PUNCT - UP 16.6%
SW PUNCT - UP 8.8%
RUNFLAT DAMAGE - UP 46.5%

	WILD-AT	WILD-HT	ATXII	FHR4S	FHRMT	FHATX	ATXLT	0
▬ CURRENT	436	266	148	19	16	10	3	0
▬ PREVIOUS	306	269	221	24	13	41	6	0
%CHG	42.5	-1.1	-33	-20.8	23.1	-75.6	-50	0
—▲— % OF TOTAL	49	78	95	97	99	100	100	100

NO STORE OR SALE ADJUSTMENTS.

CURRENT [illegible]
PREVIOUS [illegible]

ADJUSTMENT ANALYSIS - 1999 VS 1998 HALF YEAR

DEALER SALES - UP 12 6%
-DEALER ADJ UP 16 7%
DEALER CHIPPING ADJ
- DOWN 37 3%

FIRESTONE LIGHT TRUCK - RECREATIONAL
- CHIPPING -

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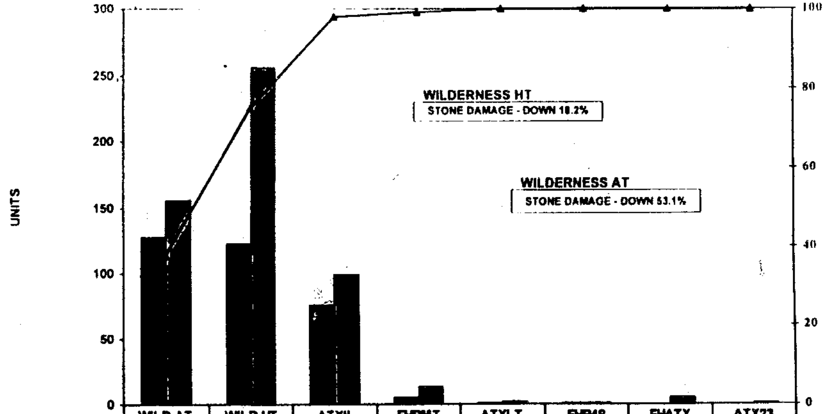

WILDERNESS HT
STONE DAMAGE - DOWN 18.2%

WILDERNESS AT
STONE DAMAGE - DOWN 53.1%

	WILD-AT	WILD-HT	ATXII	FHRMT	ATXLT	FHR4S	FHATX	ATX23
▬ CURRENT	128	123	76	5	1	1	0	0
▬ PREVIOUS	156	256	99	13	2	1	5	1
%CHG	-17.9	-52	-23.2	-61.5	-50	0	0	0
—▲— % OF TOTAL	38	75	98	99	100	100	100	100

NO STORE OR SALE ADJUSTMENTS.

CURRENT	334
PREVIOUS	533

ADJUSTMENT ANALYSIS - 1999 VS 1998 HALF YEAR

DEALER SALES - UP 12 6%
DEALER ATXII SALES - DOWN 15 9%
DEALER ATXII ADJ - DOWN 1 1%

FIRESTONE LIGHT TRUCK - RECREATIONAL
- RADIAL ATXII -

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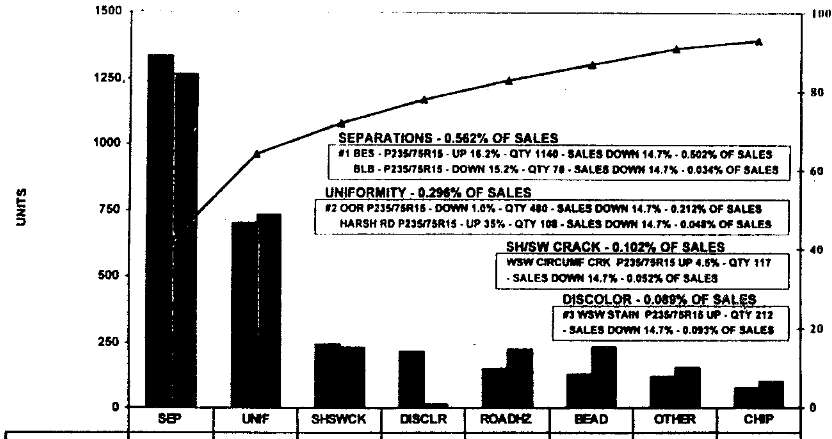

SEPARATIONS - 0.562% OF SALES

#1 BES - P235/75R15 - UP 16.2% - QTY 1140 - SALES DOWN 14.7% - 0.502% OF SALES
BLB - P235/75R15 - DOWN 15.2% - QTY 78 - SALES DOWN 14.7% - 0.034% OF SALES

UNIFORMITY - 0.296% OF SALES

#2 OOR P235/75R15 - DOWN 1.0% - QTY 480 - SALES DOWN 14.7% - 0.212% OF SALES
HARSH RD P235/75R15 - UP 35% - QTY 108 - SALES DOWN 14.7% - 0.048% OF SALES

SH/SW CRACK - 0.102% OF SALES

WSW CIRCUMF CRK P235/75R15 UP 4.5% - QTY 117
- SALES DOWN 14.7% - 0.052% OF SALES

DISCOLOR - 0.089% OF SALES

#3 WSW STAIN P235/75R15 UP - QTY 212
- SALES DOWN 14.7% - 0.093% OF SALES

	SEP	UNIF	SHSWCK	DISCLR	ROADHZ	BEAD	OTHER	CHIP
■ CURRENT	1333	702	242	212	146	128	119	76
■ PREVIOUS	1267	732	231	14	221	229	152	99
%CHG	5.2	-4.1	4.8	1414.3	-33	-44.1	-21.7	-23.2
▲ % OF TOTAL	42	64	72	78	83	87	91	93

NO STORE OR SALE ADJUSTMENTS

CURRENT 3182
PREVIOUS 3218

ADJUSTMENT ANALYSIS - 1999 VS 1998 HALF YEAR

FIRESTONE LIGHT TRUCK - RECREATIONAL
- WILDERNESS AT -

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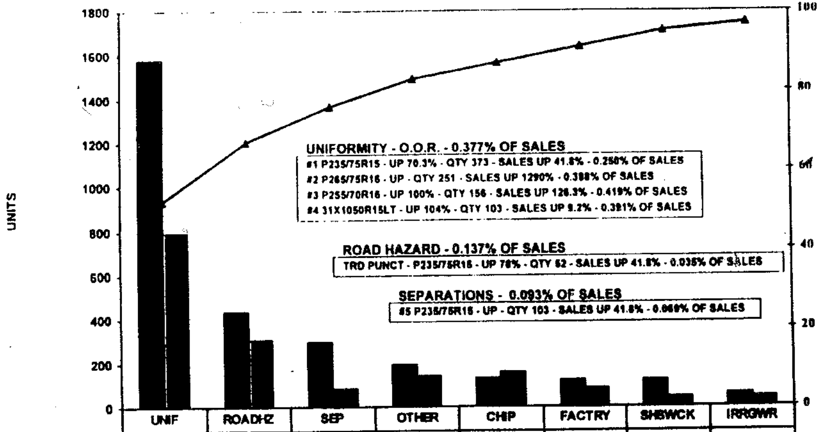
DEALER SALES - UP 12.6%
DEALER WILD-AT SALES - UP 45.0%
DEALER WILD-AT ADJ - UP 76.7%



UNIFORMITY - O.O.R. - 0.377% OF SALES
#1 P235/75R15 - UP 70.3% - QTY 373 - SALES UP 41.8% - 0.250% OF SALES
#2 P265/75R16 - UP - QTY 251 - SALES UP 1290% - 0.388% OF SALES
#3 P255/70R16 - UP 100% - QTY 156 - SALES UP 126.3% - 0.419% OF SALES
#4 31X1050R15LT - UP 104% - QTY 103 - SALES UP 9.2% - 0.391% OF SALES

ROAD HAZARD - 0.137% OF SALES
TRD PUNCT - P235/75R15 - UP 78% - QTY 52 - SALES UP 41.8% - 0.035% OF SALES

SEPARATIONS - 0.093% OF SALES
#5 P235/75R15 - UP - QTY 103 - SALES UP 41.8% - 0.069% OF SALES

	UNIF	ROADHZ	SEP	OTHER	CHIP	FACTRY	SHBWCK	IRRGWR
■ CURRENT	1581	436	296	192	128	120	119	68
■ PREVIOUS	793	306	86	142	156	84	41	43
%CHG	99.4	42.5	244.2	35.2	-17.9	42.9	190.2	34.9
—▲— % OF TOTAL	52	67	76	83	87	91	95	97

NO STORE OR SALE ADJUSTMENTS.

CURRENT 3029
PREVIOUS 1714

ADJUSTMENT ANALYSIS - 1999 VS 1998 HALF YEAR

FIRESTONE LIGHT TRUCK - RECREATIONAL
- WILDERNESS HT -

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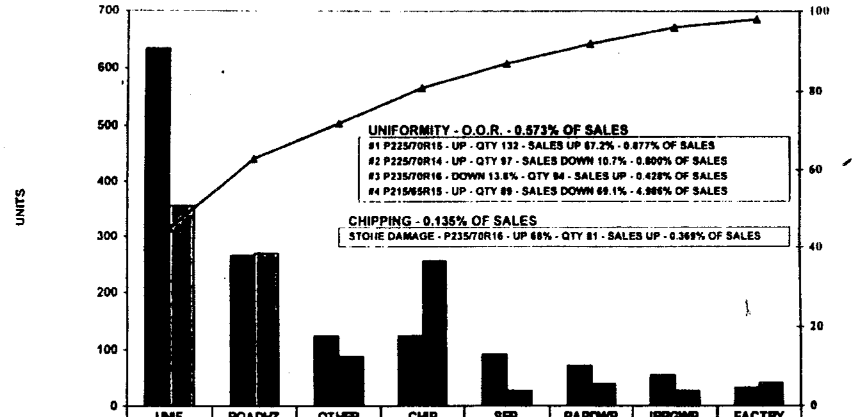
DEALER SALES - UP 12.6%
DEALER WILD-HT SALES - UP 41.5%
DEALER WILD-HT ADJ - UP 25.4%



UNIFORMITY - O.O.R. - 0.573% OF SALES
#1 P225/70R15 - UP - QTY 132 - SALES UP 87.2% - 0.877% OF SALES
#2 P225/70R14 - UP - QTY 97 - SALES DOWN 10.7% - 0.800% OF SALES
#3 P235/70R16 - DOWN 13.8% - QTY 94 - SALES UP - 0.428% OF SALES
#4 P215/65R15 - UP - QTY 89 - SALES DOWN 69.1% - 4.986% OF SALES

CHIPPING - 0.135% OF SALES
STONE DAMAGE - P235/70R16 - UP 68% - QTY 81 - SALES UP - 0.369% OF SALES

	UNIF	ROADHZ	OTHER	CHIP	SEP	RAPDWR	IRRGWR	FACTRY
■ CURRENT	635	266	124	123	91	71	55	32
■ PREVIOUS	355	269	88	256	27	39	26	40
%CHG	78.9	-1.1	40.9	-52	237	82.1	111.5	-20
—▲— % OF TOTAL	45	63	72	81	87	92	96	98

NO STORE OR SALE ADJUSTMENTS.

CURRENT 1420
PREVIOUS 1132

BRIDGESTONE/FIRESTONE, INC

Corporate Quality Assurance Division

50 Century Blvd.
Nashville, TN 37214
(PH) 615-872-1379
(FAX) 615-872-1422

Date: November [illegible] 1999

To: Mr. R C Martin

From: B.V. Halverson

Subject: VALENCIA ADJUSTED TIRE "MINI" SURVEY- OCTOBER 25-28

Valencia Technical Service collected about 200 tires that were submitted by SUV owners to Firestone dealers for adjustment

Mr. J Hoetzel and I went to Valencia the week of October 25 to analyze the tires. The tires all had a minimum of one cut through the tread and sidewall and the tires were inspected in the same way as in normal adjusted/worn tire surveys.

WILDERNESS AT TIRES

	P255/70R16 *	P235/70R16	LT245/75R16
CUSTOMER	EXPLORER/TOYOTA	EXPLORER	BLAZER
TOTAL TIRES INSPECTED	93	43	33
PRODUCING PLANT			
WILSON	60		
VALENCIA	28	43	33
JOLIETTE	5		
REMOVAL REASON			
% BES	36%	21%	54%
% BLB	20%	9%	24%
% OOR	30%	26%	12%
% NO REASON TO ADJUST	6%	35%	6%
% OTHER	9%	9%	3%
TOTAL REPAIRS	19	10	2

*The Ford Explorer uses the P255/70R16 RWL tire, the Toyota SUV uses the P255/70R16 BSW tire of which there were six tires in the 93 P255/70R16 size.

** There were actually more tires with repairs than snows in the report. Unfortunately the computer program did not save each entry that was made to indicate a repair was found in a tire. If multiple repairs were made, a note was made in the comments section. If only one repair was made, just the entry in the program was made and it was not always saved. The data in the table reflects tires that had multiple repairs or a single large repair that required a special comment. (the computer program has been corrected)

Based on the sample we inspected, the LT 245/75R16 adjusts at a higher rate for BES and BLB than the P255/70R16 and the P235/75R15.

ADDITIONAL COMMENTS

1. Four of the P255/70R16 adjusted for Out Of Round actually had a BES condition.

2. 5 tires had tread punctures as the primary removal code, three had tread punctures as a secondary removal code.

Our conclusion continues to be that service conditions in Venezuela related to tire maintenance and to speed are critical items in the performance of these tires in the Venezuela market.

On the attached charts, there is an abbreviation for the adjustment condition, "no workmanship and materials found". On the Percent of Adjustments chart is says "no work" and on the Adjustment Vs repaired tires chart it says, "work".

B.V. Halverson

B.V. Halverson
Mgr. Market Quality Engr.

CC: Mr. J. Gonzalez
Mr. L. Abreu
Mr. M. Suetsugu

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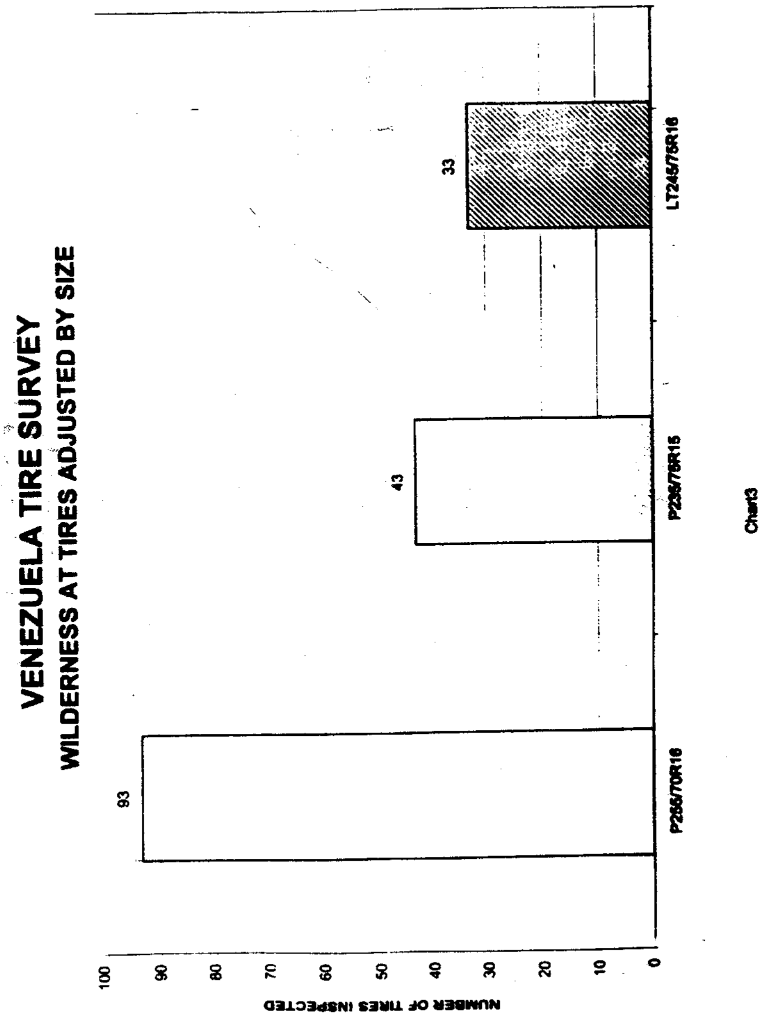
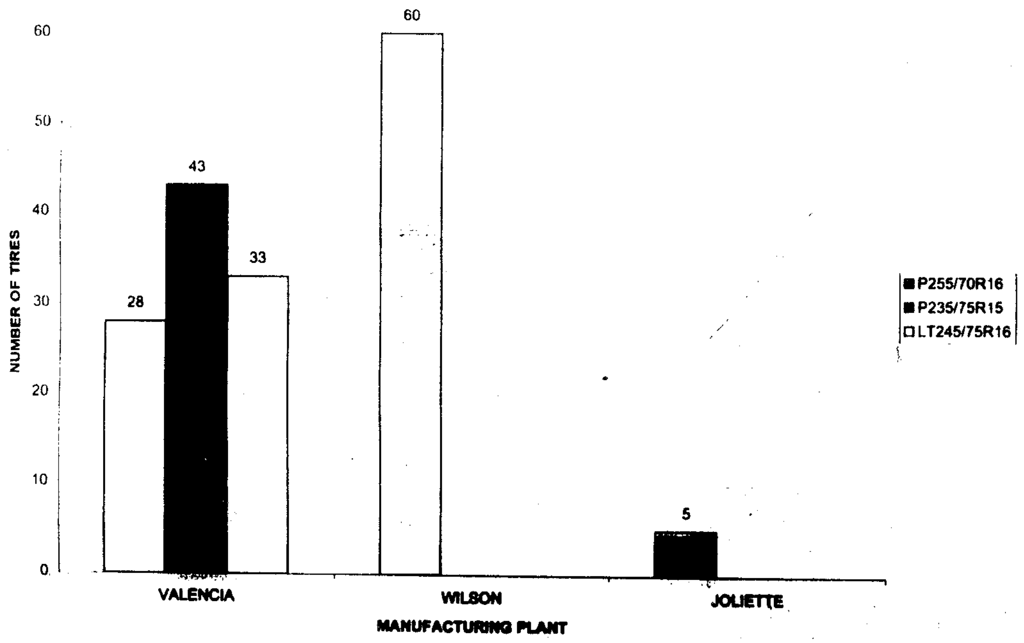
R. O. MARTIN



VENEZUELA TIRE SURVEY

WILDERNESS AT TIRES ADJUSTED BY SIZE


VENEZUELA WILDERNESS AT SURVEY

VENEZUELA WILDERNESS AT SURVEY

PERCENT OF ADJUSTMENTS BY ADJUSTMENT REASON

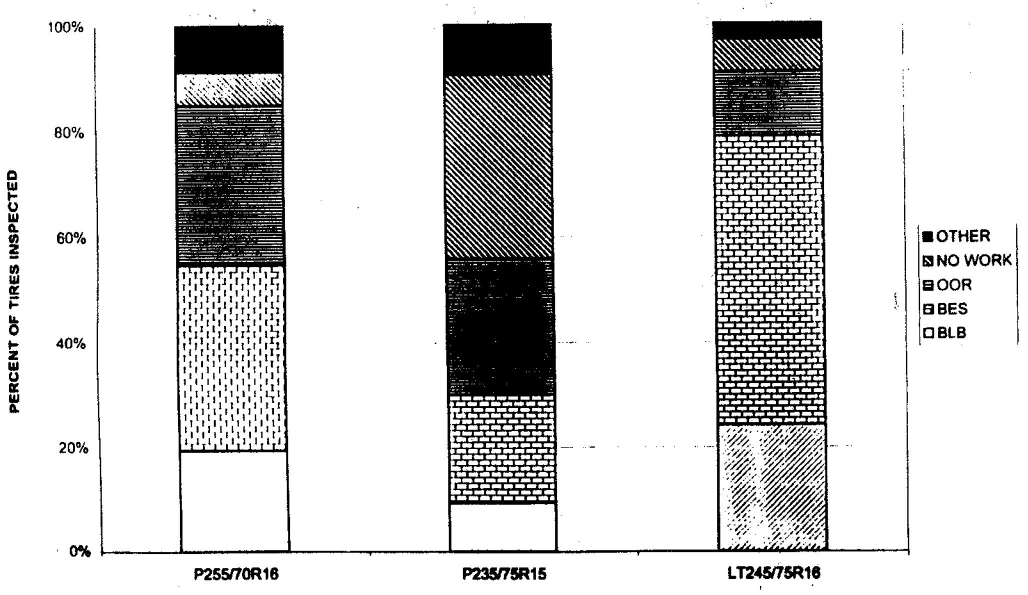


Chart5

VENEZUELA WILDERNESS AT
ADJUSTMENT VS REPAIRED TIRES

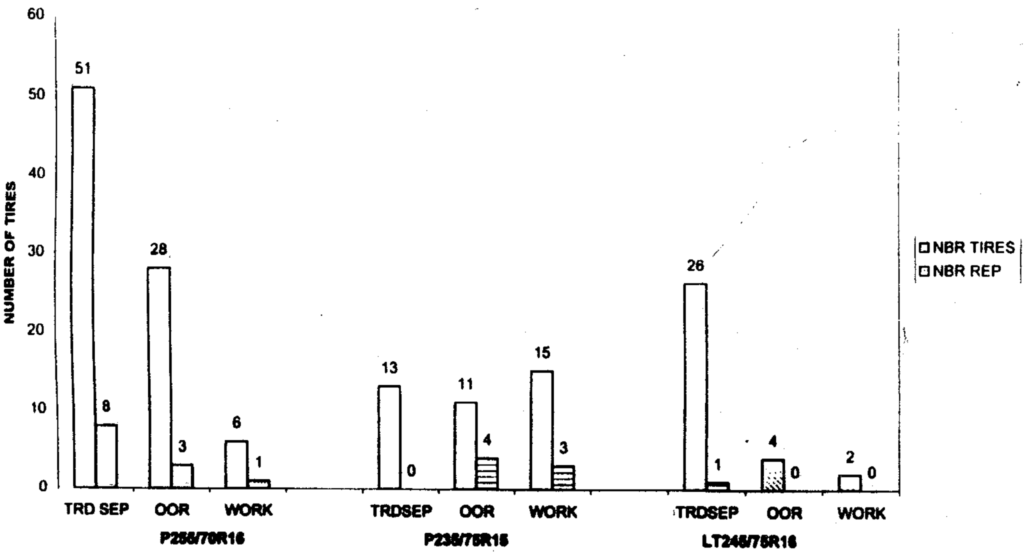


CHART 14

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BRIDGESTONE/FIRESTONE TIRE SALES COMPANY | **INTEROFFICE MEMO**

TO: Dave Laubie
DATE: January 19, 2000
FROM: William Thomas
REF. NO: WT-002
SUBJECT: 1999 Year End Minor PL Report

Attached is the 1999 Year End Minor PL Report. If you have any questions please do not hesitate to me.

cc: Gary Garfield / Jay Stapp

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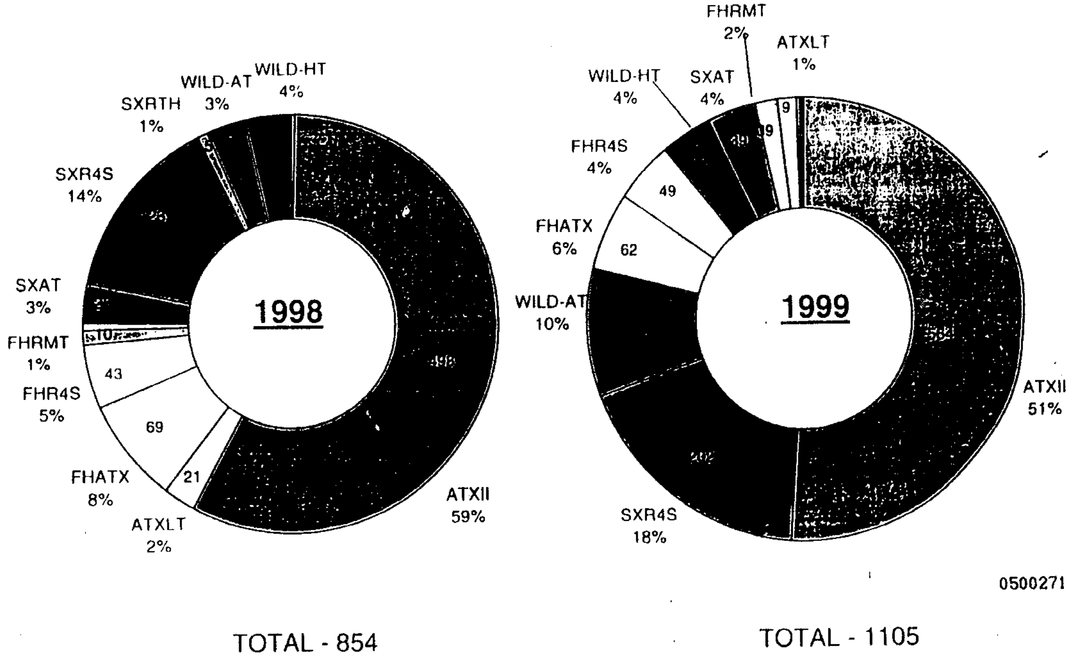
LT CLAIMS BY PATTERN (FIRESTONE)



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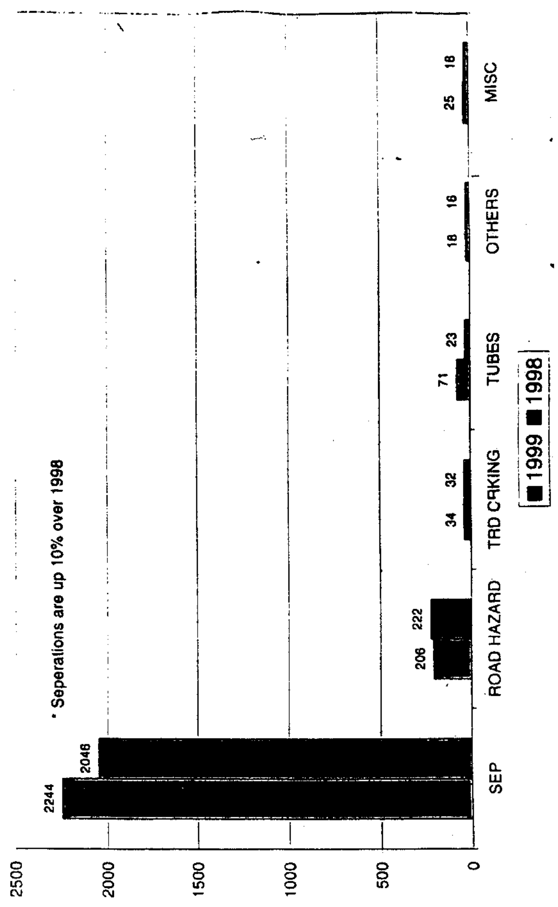
1999 SERVICE CONDITION GROUPS



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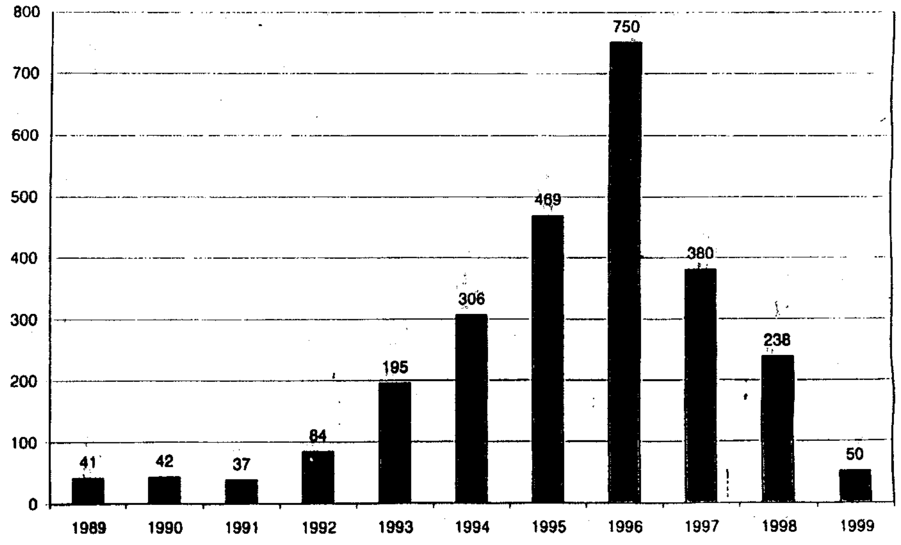
1999 Claims by Production Year



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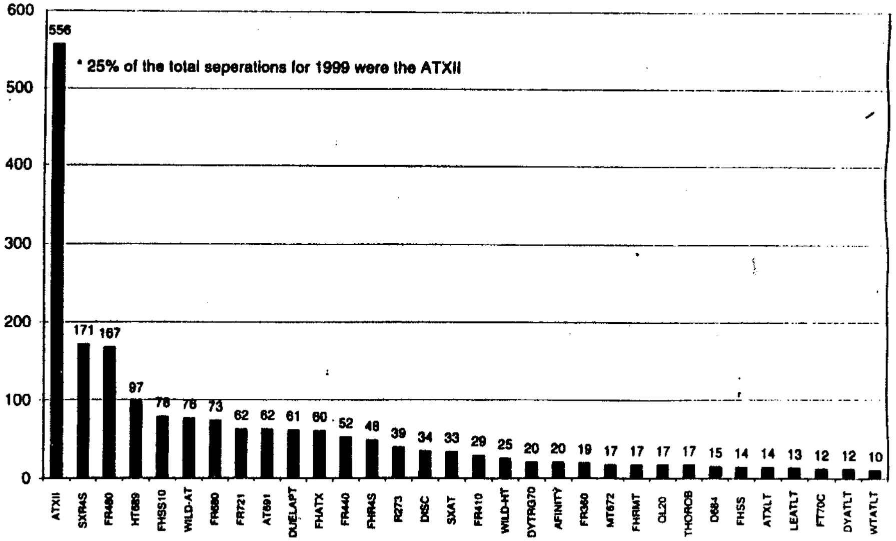
1999 Service Condition Group 01 (Seperations) by Pattern



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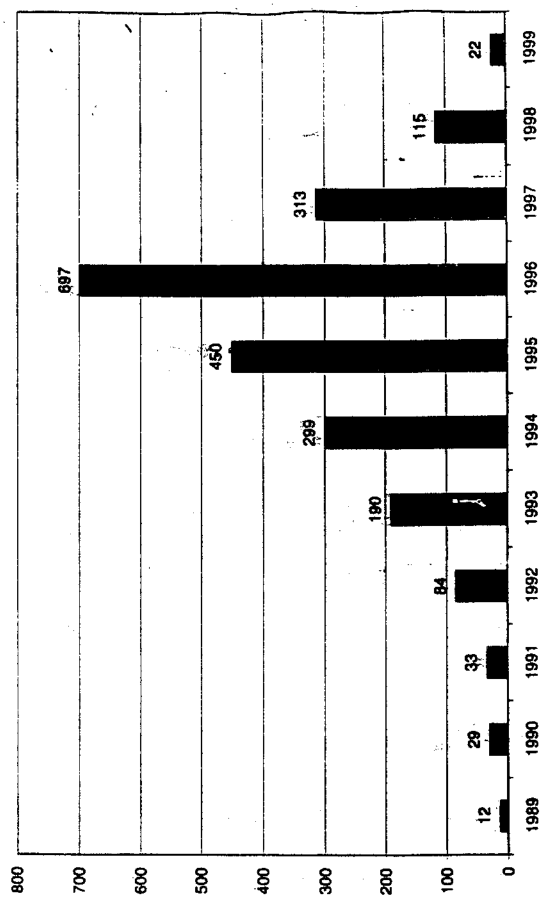
1999 Seperations by Production Year



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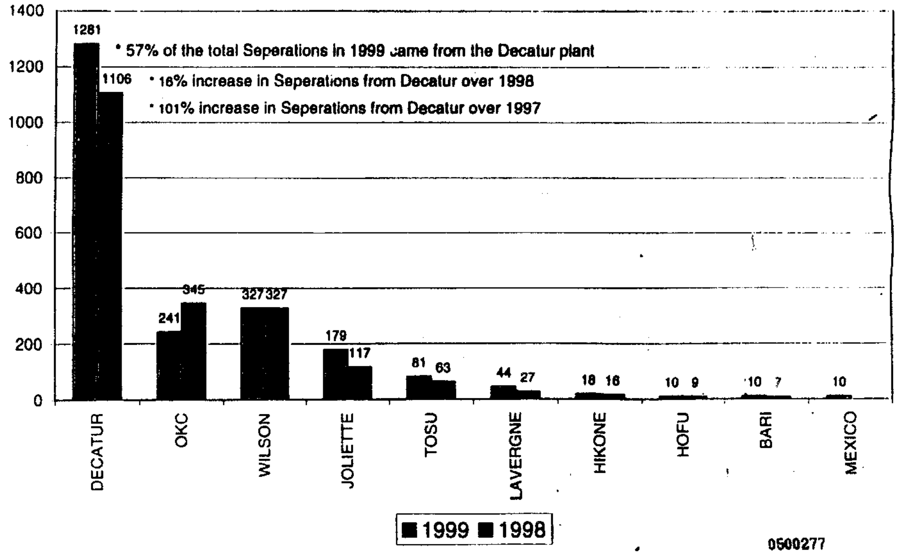
1999 Seperations by Plant



- 57% of the total Seperations in 1999 came from the Decatur plant
- 16% increase in Seperations from Decatur over 1998
- 101% increase in Seperations from Decatur over 1997

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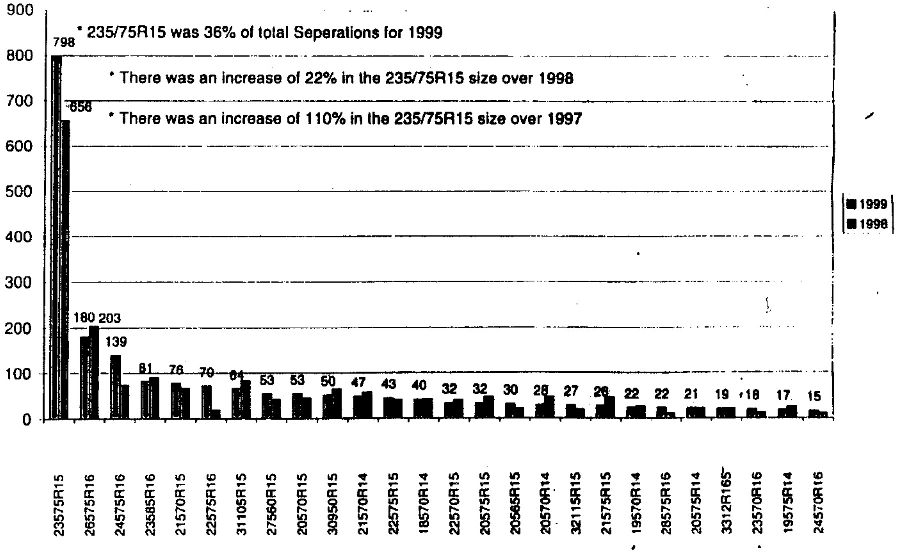
1999 Seperations by Size



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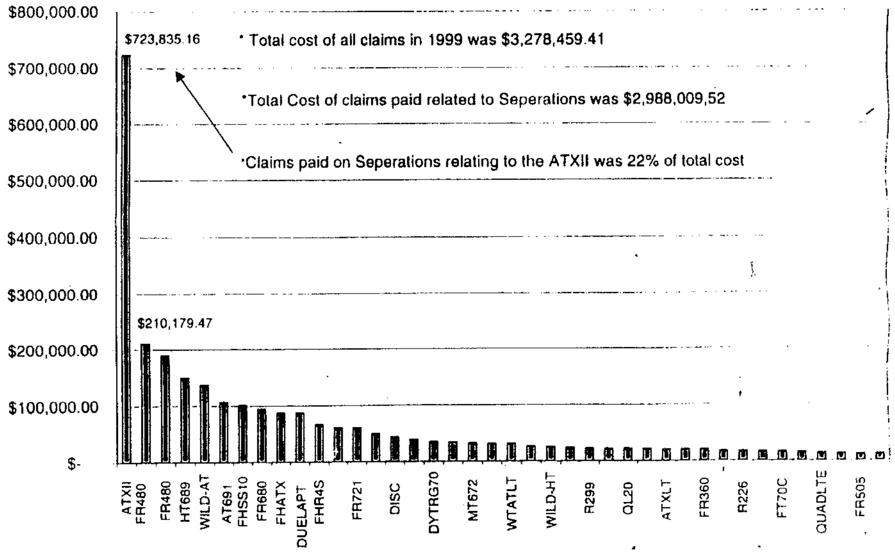
1999 Cost of Seperations by Pattern



$723,835.16

* Total cost of all claims in 1999 was $3,278,459.41

*Total Cost of claims paid related to Seperations was $2,988,009,52

*Claims paid on Seperations relating to the ATXII was 22% of total cost

$210,179.47

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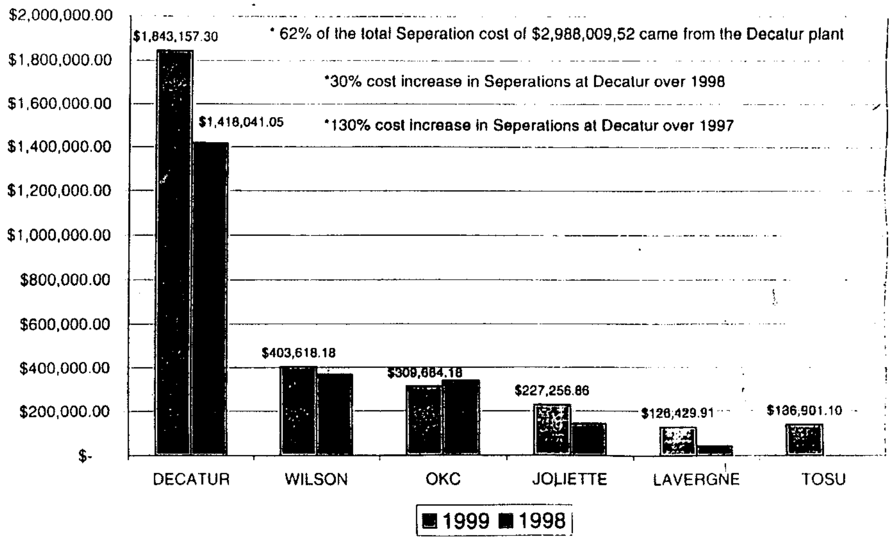
1999 Seperation Cost by Plant



* 62% of the total Seperation cost of $2,988,009,52 came from the Decatur plant

*30% cost increase in Seperations at Decatur over 1998

*130% cost increase in Seperations at Decatur over 1997

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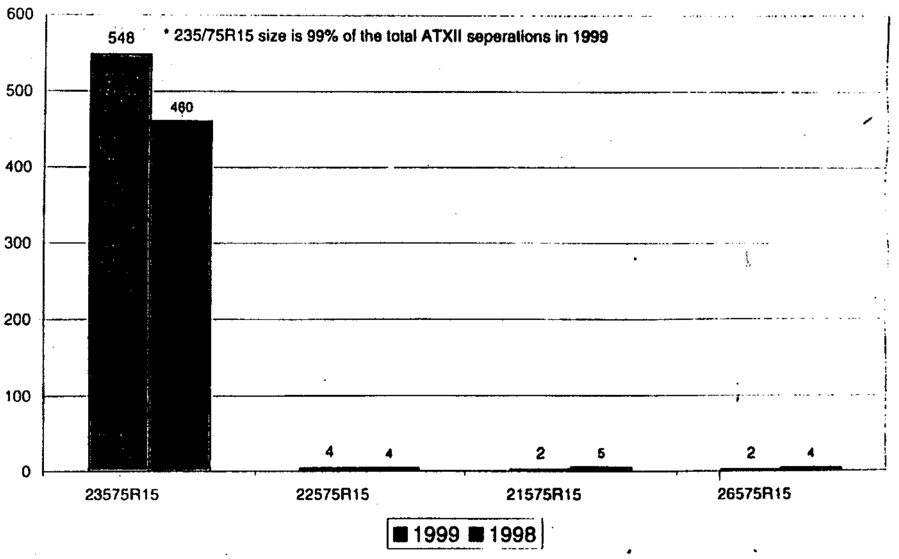
1999 ATXII SEPERATIONS BY SIZE



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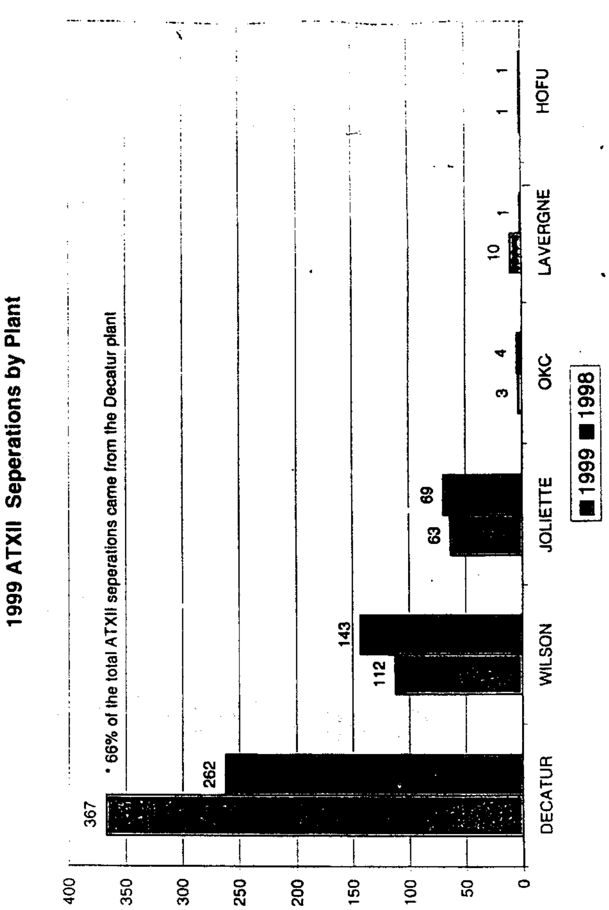

1999 ATXII Seperations by Plant

* 66% of the total ATXII seperations came from the Decatur plant

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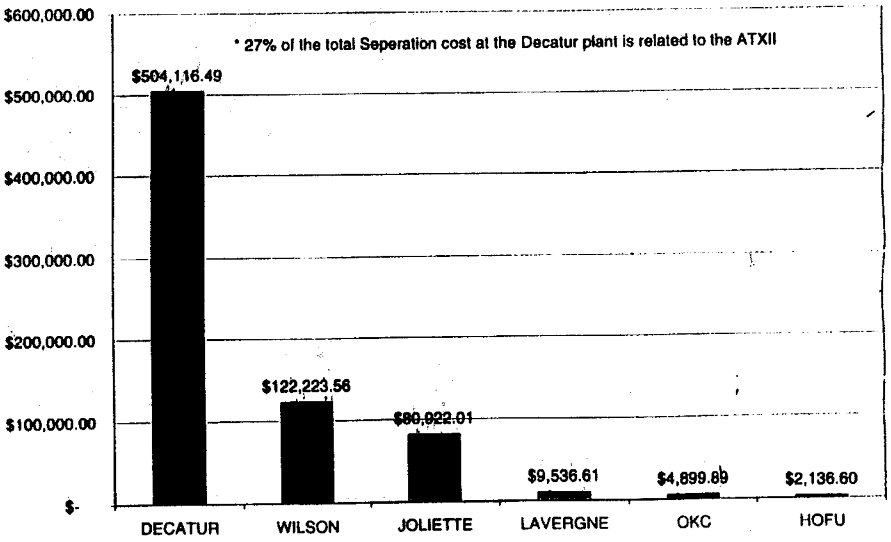
1999 Seperation Cost by Plant (ATXII only)



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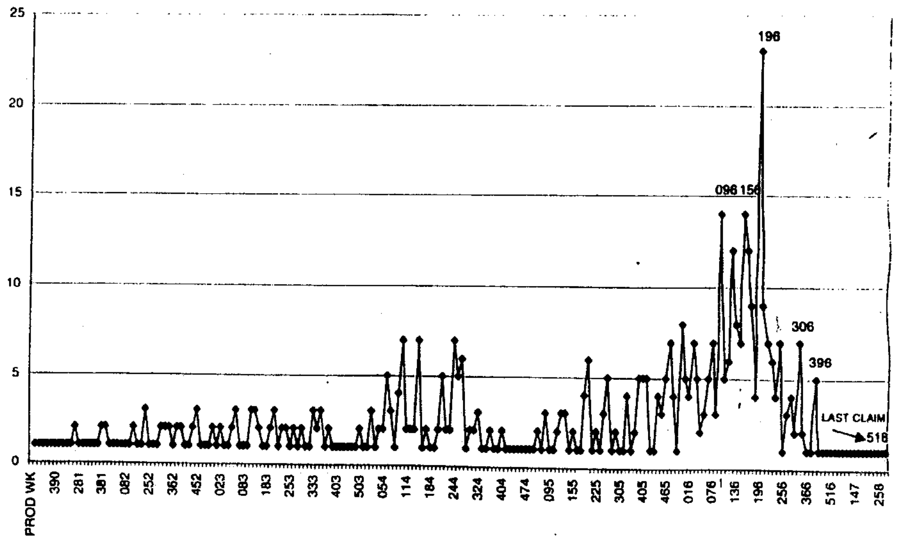
ATXII BY PROD WEEK



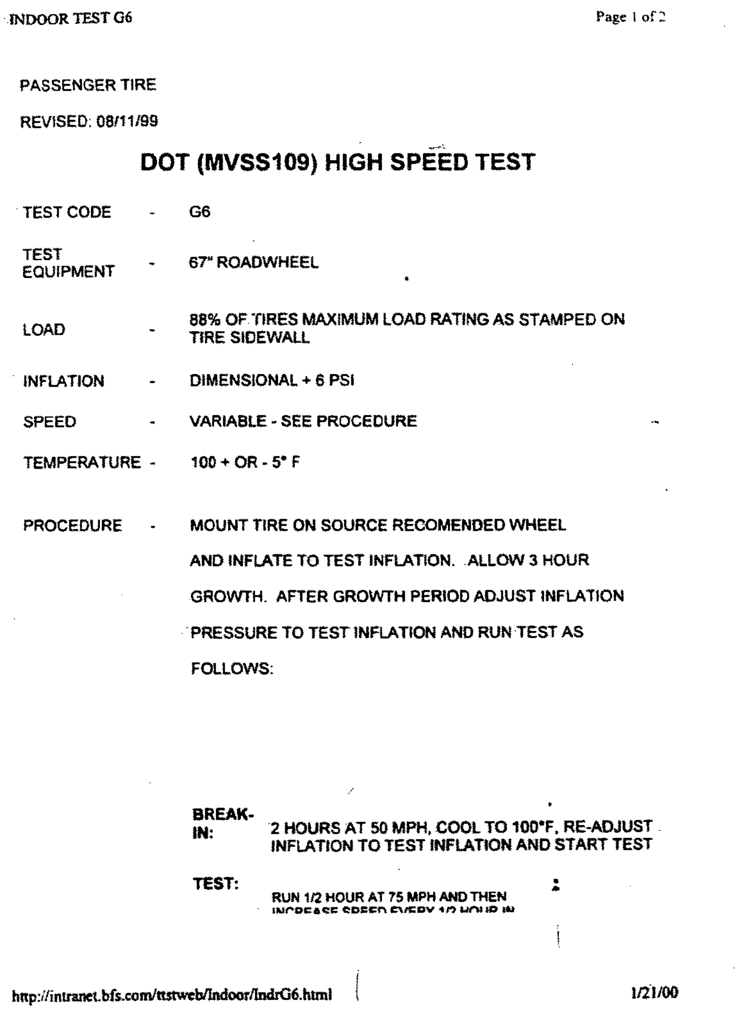
REVISED 02/21/00

PASSENGER TIRE

SPECIAL FORD HI SPEED TEST

TEST CODE	-	U5
TEST EQUIPMENT	-	T5 MACHINE AT STEEL PRODUCTS
LOAD	-	VARIABLE - AS REQUESTED ON TEST SHEET
INFLATION	-	VARIABLE-AS REQUESTED ON TEST SHEET
SPEED	-	VARIABLE-SEE PROCEDURE
TEMPERATURE	-	100 + OR - 5 DEGREES F.
PROCEDURE	-	MOUNT TIRE ON SOURCE RECOMENDED WHEEL AND INFLATE TO TEST INFLATION.ALLOW 3 HOUR GROWTH. AFTER GROWTH PERIOD ADJUST INFLATION PRESSURE TO TEST INFLATION BREAK IN IS RUN AT 17%,33%,50%,66% and 83% STEP #1 SPEED FOR 2 MINUTES EACH. TEST IS SET UP BY COMPUTER AFTER TARGET SPEED IS ENTERED COMPUTER WILL CALCULATE SPEEDS STARTING AT TARGET SPEED MINUS 40 KPH FOR 10 MINUTES ANDTHEN INCREASING SPEED 10 KPH EACH 10 MINUTES TO TIRE FAILURE OR MAXIMUM MACHINE SPEED.(400 kph)
TEST DURATION	-	TO FAILURE

RPK10151992



PASSENGER TIRE

REVISED: 08/11/99

DOT (MVSS109) HIGH SPEED TEST

TEST CODE	-	G6
TEST EQUIPMENT	-	67" ROADWHEEL
LOAD	-	88% OF TIRES MAXIMUM LOAD RATING AS STAMPED ON TIRE SIDEWALL
INFLATION	-	DIMENSIONAL + 6 PSI
SPEED	-	VARIABLE - SEE PROCEDURE
TEMPERATURE	-	100 + OR - 5° F
PROCEDURE	-	MOUNT TIRE ON SOURCE RECOMENDED WHEEL AND INFLATE TO TEST INFLATION. ALLOW 3 HOUR GROWTH. AFTER GROWTH PERIOD ADJUST INFLATION PRESSURE TO TEST INFLATION AND RUN TEST AS FOLLOWS:

BREAK-IN:	2 HOURS AT 50 MPH, COOL TO 100°F, RE-ADJUST INFLATION TO TEST INFLATION AND START TEST
TEST:	RUN 1/2 HOUR AT 75 MPH AND THEN INCREASE SPEED EVERY 1/2 HOUR IN

[illegible]
5 MPH INCREMENTS UNTIL TIRE FAILURE

TEST DURATION - GOVERNMENT -(1/2 HOUR AT 85 MPH)

FIRESTONE - TO FAILURE

REVISED 08/11/99

PASSENGER TIRE

ECE 30 SPEED CERTIFICATION

FOR "H" SPEED RATED TIRES-STANDARD RADIAL TIRE

TEST CODE -	U7H
TEST EQUIPMENT-	67" ROADWHEEL (1.7 METER)
LOAD -	80% OF MAXIMUM
WHEEL -	SOURCE RECOMMENDED
SPEED -	SEE PROCEDURE
TEMPERATURE -	AMBIENT TEMPERATURES ARE AS FOLLOWS: MEASUREMENTS = 75 DEGREES +/- 5 DEGREES F. DRUM TEST = 100 DEGREES +/- 5 DEGREES F.

PROCEDURE-*

STEP A. MOUNT TIRE ON RECOMENDED WHEEL AND INFLATE TO MEASUREMENT INFLATION OF 1.6 BARS (26psi).

STEP B. ALLOW MINIMUM 24 HOUR GROWTH PERIOD.

STEP C. MEASURE TIRE OVERALL WIDTH AT 6 LOCATIONS APPROXIMATELY 60 DEGREES APART AROUND TIRE. LETTERS OR OTHER PROTUBERANCES SHOULD BE INCLUDED IN THE MEASUREMENTS.THE HIGHEST MEASUREMENT SO OBTAINED IS TAKEN AS THE OVERALL WIDTH.THE HEIGHT OF THE TREAD WEAR INDICATORS IS MEASURED AT 6 ARBITRARY LOCATIONS IN THE TREAD GROOVES.

STEP D. SET INFLATION PRESSURE TO 40.6 PSI (2.8 BAR) AND ALLOW 3 HOURS AT 100 DEGREES F.

STEP E. ADJUST PSI TO 41 AND RUN TEST BELOW

STEP 1. 5 MINUTES AT 50 MPH

STEP 2. 5 MINUTES AT 75 MPH

STEP 3. 10 MINUTES AT 106 MPH (170kph)

STEP 4. 10 MINUTES AT 112 MPH (180kph)

STEP 5. 10 MINUTES AT 118 MPH (190kph)

STEP 6. 20 MINUTES AT 124 MPH (200kph)

IF NO FAILURE TIRE IS TO BE REMOVED FROM

MACHINE AND PLACED IN MEASUREMENT ROOM FOR A MINIMUM OF 6 HOURS AT

MEASUREMENT INFLATION PRESSURE.AFTER 6 HOURS RESET INFLATION AND

MEASURE TIRE WITH PROFILOMETER.

* REMOVED BIAS TIRE INFLATION CHART

REVISED 08/11/99

PASSENGER TIRE

ECE 30 SPEED CERTIFICATION

FOR "S" SPEED RATED TIRES

TEST CODE	- U7S
TEST EQUIPMENT	- 67" ROADWHEEL (1.7 METER)
LOAD	- 80% OF MAXIMUM AT SPECIFIED PSI.
WHEEL	- SOURCE RECOMMENDED
SPEED	- SEE PROCEDURE
TEMPERATURE	- AMBIENT TEMPERATURES ARE AS FOLLOWS:
	MEASUREMENTS = 75 DEGREES +/- 5 DEGREES F.
	DRUM TEST = 100 DEGREES +/- 5 DEGREES F.

PROCEDURE -

STEP A.	MOUNT TIRE ON SOURCE RECOMENDED WHEEL AND INFLATE TO MEASUREMENT INFLATION OF 1.8 BARS (26psi).
STEP B.	ALLOW MINIMUM 24 HOUR GROWTH PERIOD.
STEP C.	MEASURE TIRE OVERALL WIDTH AT 6 LOCATIONS APPROXIMATELY 60 DEGREES APART AROUND TIRE.LETTERS OR OTHER PROTUBERANCES SHOULD BE INCLUDED IN THE MEASUREMENTS.THE HIGHEST MEASUREMENT SO OBTAINED IS TAKEN AS THE OVERALL WIDTH.THE HEIGHT OF THE TREAD WEAR INDICATORS IS MEASURED AT 6 ARBITRARY LOCATIONS IN THE TREAD GROOVES.
STEP D.	SET INFLATION PRESSURE TO 37.7 PSI (2.6bar)AND ALLOW 3 HOURS AT 100 DEGREES F.
**STEP E.	ADJUST PSI TO 37.7 AND RUN TEST BELOW

STEP 1. 5 MINUTES AT 50 MPH

STEP 2. 5 MINUTES AT 75 MPH

*** **STEP 3**. 10 MINUTES AT 87 MPH (140kph)

*** **STEP 4**. 10 MINUTES AT 93 MPH (150kph)

STEP 5. 10 MINUTES AT 99 MPH (160kph)

STEP 6. 20 MINUTES AT 106 MPH (170kph) IF NO FAILURE TIRE IS TO BE REMOVED FROM MACHINE AND PLACED IN MEASUREMENT ROOM FOR A MINIMUM OF 6 HOURS AT MEASUREMENT INFLATION PRESSURE.AFTER 6 HOURS RESET INFLATION AND MEASURE TIRE WITH PROFILOMETER.

* REMOVED INFLATION CHART FOR BIAS TIRES.

REVISIONS 12/6/1994,

** REVISED PSI CALCULATION FROM 38 TO 37.7

*** REVISED SPEED CALCULATIONS USING: 1.60935 KPH = 1 MPH,FOR CONVERSIONS

PASSENGER TIRE

REVISED 08/11/99

S.A.E. HIGH SPEED TEST

"S" SPEED RATING

TEST CODE	U1
TEST EQUIPMENT	T5 MACHINE AT STEEL PRODUCTS
LOAD	80% OF MAXIMUM LOAD STAMPED ON SIDEWALL
INFLATION ***	38 PSI (CAPPED) SEE NOTE BELOW ***
SPEED	VARIABLE-SEE PROCEDURE
TEMPERATURE	100 + OR - 5 DEGREES F.
PROCEDURE	- MOUNT TIRE ON SOURCE RECOMENDED WHEEL AND INFLATE TO TEST INFLATION.ALLOW 3 HOUR GROWTH. AFTER GROWTH PERIOD ADJUST INFLATION PRESSURE TO TEST INFLATION AND RUN TEST AS FOLLOWS:

5 MINUTES AT 50 MPH

5 MINUTES AT 75 MPH

10 MINUTES AT 87 MPH

10 MINUTES AT 93 MPH

10 MINUTES AT 99 MPH

10 MINUTES AT 106 MPH

10 MINUTES AT 112 MPH=TARGET SPEED

10 MINUTES AT 118 MPH

10 MINUTES AT 124 MPH

10 MINUTES AT 130 MPH

10 MINUTES AT 137 MPH

10 MINUTES AT 143 MPH

10 MINUTES AT 149 MPH

10 MINUTES AT 155 MPH

10 MINUTES AT 161 MPH
10 MINUTES AT 168 MPH
10 MINUTES AT 174 MPH
10 MINUTES AT 180 MPH
10 MINUTES AT 186 MPH
10 MINUTES AT 193 MPH
10 MINUTES AT 199 MPH
10 MINUTES AT 205 MPH
10 MINUTES AT 211 MPH
10 MINUTES AT 217 MPH
10 MINUTES AT 224 MPH
10 MINUTES AT 230 MPH
10 MINUTES AT 236 MPH
10 MINUTES AT 242 MPH
10 MINUTES AT 249 MPH

TEST DURATION - TO FAILURE

*** NOTE: INFLATION PRESSURE WAS CHANGED ON THIS TEST BY S.A.E. AS DESCRIBED IN SAE J1561 NOVEMBER 1990. ALL TESTS RAN PRIOR TO SEPTEMBER 1992 WERE RUN AT 41 PSI CAPPED INFLATION PRESSURE. ALL TESTS RAN AFTER SEPTEMBER 1, 1992 WILL BE RUN AT 38 PSI CAPPED INFLATION PRESSURE AS DESCRIBED IN THE SAE "LABORATORY SPEED TEST PROCEDURE FOR PASSENGER CAR TIRES – SAE 1561 NOV 90".

PK030993

PASSENGER TIRE

SPECIAL FORD DURABILITY TEST

TEST CODE - K3
TEST EQUIPMENT - 67" ROADWHEEL
>
LOAD - MAXIMUM TIRE SIDEWALL STAMPING
INFLATION - DIMENSIONAL
SPEED - 50 MPH
TEMPERATURE - 100° ± 5°F.
>
PROCEDURE - MOUNT TIRE ON SOURCE RECOMMENDED WHEEL AND INFLATE TO TEST INFLATION. ALLOW 3 HOUR GROWTH. AFTER GROWTH PERIOD ADJUST INFLATION PRESSURE TO TEST INFLATION AND RUN TEST AS FOLLOWS:
>

STEP	LOAD CONDITION	DURATION (hours)
1	85% MAXIMUM SIDEWALL STAMPING	4
2	90% MAXIMUM SIDEWALL STAMPING	6
3	100% MAXIMUM SIDEWALL STAMPING	24
4	130% MAXIMUM SIDEWALL STAMPING	96

>
TEST DURATION - 130 HOURS

ACUÑA TEST PROCEDURES

GENERAL INFORMATION

Test Code: D1

Description: ATE / VAR. 4G - Standard Load Passenger

TIRE INFORMATION

Load:	Front	As specified* (rated load)
	Rear	As specified* (maximum load)
Inflation Pressure:	Front	26 PSI
	Rear	35 PSI
Advanced Prep.	Initial Measurements	Skid Depth Section Width Outside Circ. Tread Radius Tread Width Durometer
	Screen measured dimensions for application suitability	
	Holography	
	Dynamic Balance	

VEHICLE INFORMATION

Type: As specified*

Rim Size: As specified*

Alignment:

	Front	Rear
Toe (deg.)	0.0	Nominal
Camber (deg.)	Nominal	Nominal
Caster (deg.)	Nominal	Nominal

Notes:

Alignments to be set in the fully loaded condition.

Settings specified as "Nominal" should be set to midrange of manufacturer's specification.

Toe is NOT to be reset unless total toe has changed from original setting by greater than .05" (.10°).

TEST INFORMATION

Duration: 40,000 mi.

Routing:

		Per Shift			
Course		**Speed**	**%**	**Laps**	**Distance(mi.)**
Track	**(Outside Lane)**	**70**	**98.3**	**83**	**589**
	(Inside Lane)	-	-	-	-
Highway		-	-	-	-
City		**15**	**1.7**	**7**	**10**
Gravel		-	-	-	-
Cobblestone		-	-	-	-
Other		-	-	-	-
TOTAL		-	100.0	-	599

Test Sequence: The test sequence is varied depending on the number of vehicles running on a particular test schedule. All vehicles on the same test run the same sequence, but each test may have a different sequence depending on traffic conditions. The sequence may differ, but the overall routing will be the same for each test.

Alternation Schedule: Daily

Rotation Schedule: Hold

Stops/Accels./Decels.: None

Special Instructions: None

INSPECTIONS

Photographs:	15,000 mi.	Growth Measurments:	5,000 mi.
	20,000 mi.		40,000 mi. (final)
	25,000 mi.		
	30,000 mi.	Alignments:	0 mi.
	35,000 mi.		5,000 mi.
	40,000 mi. (final)		10,000 mi.
			15,000 mi.
			20,000 mi.
			25,000 mi.
Skid Loss Measurments:	0 mi.		30,000 mi.
	15,000 mi.		35,000 mi.
	20,000 mi.		40,000 mi. (final)
	25,000 mi.		
	30,000 mi.	Holography:	0 mi.
	35,000 mi.		15,000 mi.

40,000 mi. (final)	20,000 mi. 25,000 mi. 30,000 mi. 35,000 mi. 40,000 mi. (final)

NOTE: Any category having an asterisk (*) indicated after it should have that information included in the appropriate category or Comments section of the test instruction sheet.

ACUÑA TEST PROCEDURES

GENERAL INFORMATION

Test Code: D1Q

Description: ATE / VAR. 4G - Standard Load Passenger Tire Qualification

TIRE INFORMATION

Load:	Front	As specified* (rated load)
	Rear	As specified* (maximum load)
Inflation Pressure:	Front	26 PSI
	Rear	35 PSI
Advanced Prep.	Initial Measurements	Skid Depth
		Section Width
		Outside Circ.
		Tread Radius
		Tread Width
		Durometer
	Screen measured dimensions for application suitability	
	Holography	
	Dynamic Balance	

VEHICLE INFORMATION

Type: As specified*

Rim Size: As specified*

Alignment:

	Front	Rear
Toe (deg.)	0.0	Nominal
Camber (deg.)	Nominal	Nominal
Caster (deg.)	Nominal	Nominal

Notes:

Alignments to be set in the fully loaded condition.

Settings specified as "Nominal" should be set to midrange of manufacturer's specification.

Toe is NOT to be reset unless total toe has changed from original setting by greater than .05" (.10°).

TEST INFORMATION

Duration: 32,000 mi.

Routing:

Course		Per Shift Speed	%	Laps	Distance(mi.)
Track	(Outside Lane)	70	98.3	83	589
	(Inside Lane)	-	-	-	-
Highway		-	-	-	-
City		15	1.7	7	10
Gravel		-	-	-	-
Cobblestone		-	-	-	-
Other		-	-	-	-
TOTAL		-	100.0	-	599

Test Sequence: The test sequence is varied depending on the number of vehicles running on a particular test schedule. All vehicles on the same test run the same sequence, but each test may have a different sequence depending on traffic conditions. The sequence may differ, but the overall routing will be the same for each test.

Alternation Schedule: Daily

Rotation Schedule: Hold

Stops/Accels./Decels.: None

Special Instructions: None

INSPECTIONS

Photographs	15,000 mi. 20,000 mi. 25,000 mi. 32,000 mi. (final)	Growth Measurments:	5,000 mi. 32,000 mi. (final)
		Alignments:	0 mi. 5,000 mi. 10,000 mi. 15,000 mi. 20,000 mi. 25,000 mi. 32,000 mi.(final)
Skid Loss Measurments:	0 mi. 15,000 mi. 20,000 mi. 25,000 mi. 32,000 mi. (final)	Holography:	0 mi. 15,000 mi. 20,000 mi.

25,000 mi.
32,000 mi.(final)

NOTE: Any category having an asterisk (*) indicated after it should have that information included in the appropriate category or Comments section of the test instruction sheet.

ACUÑA TEST PROCEDURES

GENERAL INFORMATION

Test Code: D2
Description: ATE / VAR. 4G - Extra Load Passenger

TIRE INFORMATION

Load:	Front	As specified* (rated load)
	Rear	As specified* (maximum load)
Inflation Pressure:	Front	31 PSI
	Rear	41 PSI
Advanced Prep.	Initial Measurements	Skid Depth
		Section Width
		Outside Circ.
		Tread Radius
		Tread Width
		Durometer
	Screen measured dimensions for application suitability	
	Holography	
	Dynamic Balance	

VEHICLE INFORMATION

Type:	As specified*		
Rim Size:	As specified*		
Alignment:		Front	Rear
	Toe (deg.)	0.0	Nominal
	Camber (deg.)	Nominal	Nominal
	Caster (deg.)	Nominal	Nominal
	Notes:	Alignments to be set in the fully loaded condition. Settings specified as "Nominal" should be set to midrange of manufacturer's specification. Toe is NOT to be reset unless total toe has changed from original setting by greater than .05" (.10°).	

TEST INFORMATION

Duration: 40,000 mi.

Routing:

Course		Per Shift Speed	%	Laps	Distance(mi.)
Track	(Outside Lane)	70	98.3	83	589
	(Inside Lane)	-	-	-	-
Highway		-	-	-	-
City		15	1.7	7	10
Gravel		-	-	-	-
Cobblestone		-	-	-	-
Other		-	-	-	-
TOTAL		-	100.0	-	599

Test Sequence: The test sequence is varied depending on the number of vehicles running on a particular test schedule. All vehicles on the same test run the same sequence, but each test may have a different sequence depending on traffic conditions. The sequence may differ, but the overall routing will be the same for each test.

Alternation Schedule: Daily

Rotation Schedule: Hold

Stops/Accels./Decels.: None

Special Instructions: None

INSPECTIONS

Photographs:	15,000 mi.	Growth	5,000 mi.
	20,000 mi.	Measurments:	40,000 mi. (final)
	25,000 mi.		
	30,000 mi.	Alignments:	0 mi.
	35,000 mi.		5,000 mi.
	40,000 mi. (final)		10,000 mi.
			15,000 mi.
Skid Loss	0 mi.		20,000 mi.
Measurments:	15,000 mi.		25,000 mi.
	20,000 mi.		30,000 mi.
	25,000 mi.		35,000 mi.
	30,000 mi.		40,000 mi.(final)
	35,000 mi.	Holography:	0 mi.
	40,000 mi. (final)		15,000 mi.

20,000 mi.
25,000 mi.
30,000 mi.
35,000 mi.
40,000 mi.(final)

NOTE: Any category having an asterisk (*) indicated after it should have that information included in the appropriate category or Comments section of the test instruction sheet.

ACUÑA TEST PROCEDURES

GENERAL INFORMATION

Test Code: D2Q

Description: ATE / VAR. 4G - Extra Load Passenger Qualification

TIRE INFORMATION

Load:	Front	As specified* (rated load)
	Rear	As specified* (maximum load)
Inflation Pressure:	Front	31 PSI
	Rear	41 PSI
Advanced Prep.	Initial Measurements	Skid Depth
		Section Width
		Outside Circ.
		Tread Radius
		Tread Width
		Durometer
	Screen measured dimensions for application suitability	
	Holography	
	Dynamic Balance	

VEHICLE INFORMATION

Type: As specified*

Rim Size: As specified*

Alignment:

	Front	Rear
Toe (deg.)	0.0	Nominal
Camber (deg.)	Nominal	Nominal
Caster (deg.)	Nominal	Nominal

Notes:
Alignments to be set in the fully loaded condition.
Settings specified as "Nominal" should be set to midrange of manufacturer's specification.
Toe is NOT to be reset unless total toe has changed from original setting by greater than .05" (.10°).

TEST INFORMATION

Duration: 32,000 mi.

Routing:

Course		Per Shift Speed	%	Laps	Distance(mi.)
Track	(Outside Lane)	70	98.3	83	589
	(Inside Lane)	-	-	-	-
Highway		-	-	-	-
City		15	1.7	7	10
Gravel		-	-	-	-
Cobblestone		-	-	-	-
Other		-	-	-	-
TOTAL		-	100.0	-	599

Test Sequence: The test sequence is varied depending on the number of vehicles running on a particular test schedule. All vehicles on the same test run the same sequence, but each test may have a different sequence depending on traffic conditions. The sequence may differ, but the overall routing will be the same for each test.

Alternation Schedule: Daily

Rotation Schedule: Hold

Stops/Accels./Decels.: None

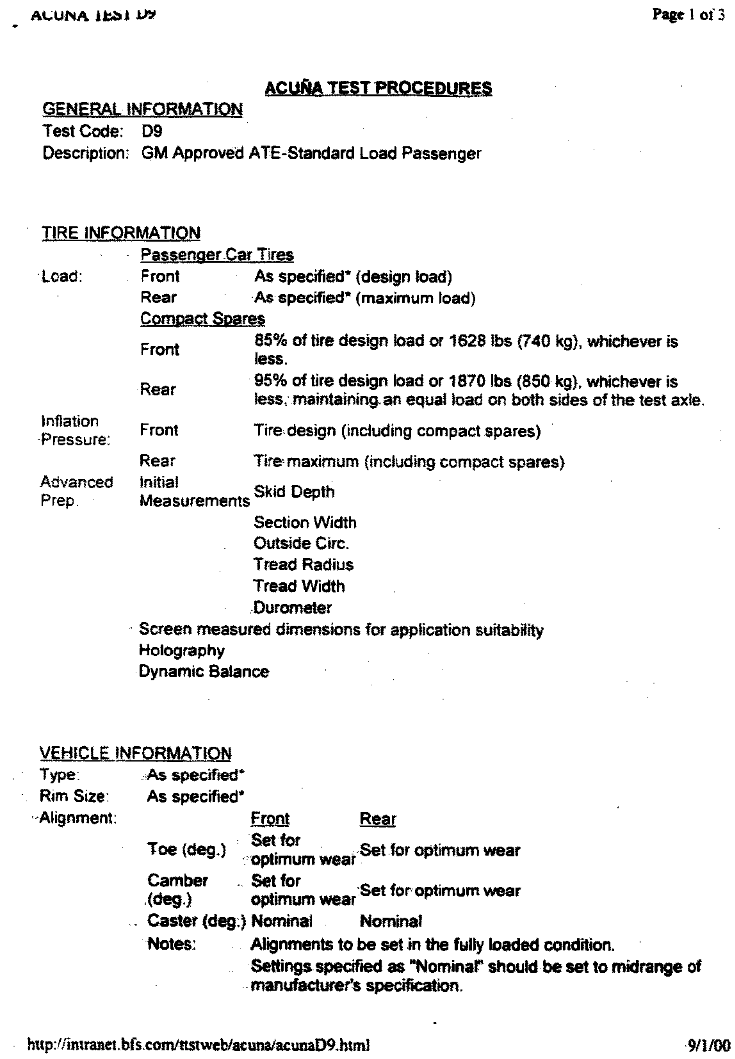
Special Instructions: None

INSPECTIONS

Photographs:	15,000 mi. 20,000 mi. 25,000 mi. 32,000 mi. (final)	Growth Measurments:	5,000 mi. 32,000 mi. (final)
		Alignments:	0 mi. 5,000 mi. 10,000 mi. 15,000 mi. 20,000 mi. 25,000 mi. 32,000 mi.(final)
Skid Loss Measurments:	0 mi. 15,000 mi. 20,000 mi. 25,000 mi. 32,000 mi. (final)	Holography:	0 mi. 15,000 mi. 20,000 mi.

25,000 mi.
32,000 mi.(final)

NOTE: Any category having an asterisk (*) indicated after it should have that information included in the appropriate category or Comments section of the test instruction sheet.



ACUÑA TEST PROCEDURES

GENERAL INFORMATION

Test Code: D9
Description: GM Approved ATE-Standard Load Passenger

TIRE INFORMATION

	Passenger Car Tires	
Load:	Front	As specified* (design load)
	Rear	As specified* (maximum load)
	Compact Spares	
	Front	85% of tire design load or 1628 lbs (740 kg), whichever is less.
	Rear	95% of tire design load or 1870 lbs (850 kg), whichever is less, maintaining an equal load on both sides of the test axle.
Inflation Pressure:	Front	Tire design (including compact spares)
	Rear	Tire maximum (including compact spares)
Advanced Prep.	Initial Measurements	Skid Depth Section Width Outside Circ. Tread Radius Tread Width Durometer
	Screen measured dimensions for application suitability	
	Holography	
	Dynamic Balance	

VEHICLE INFORMATION

Type: As specified*
Rim Size: As specified*

		Front	Rear
Alignment:			
	Toe (deg.)	Set for optimum wear	Set for optimum wear
	Camber (deg.)	Set for optimum wear	Set for optimum wear
	Caster (deg.)	Nominal	Nominal
	Notes:	Alignments to be set in the fully loaded condition. Settings specified as "Nominal" should be set to midrange of manufacturer's specification.	

Toe is NOT to be reset unless total toe has changed from original setting by greater than .05" (.10°).

Compact Spares: The camber on the test position with compact spare installed should be 1 1/2 greater than the normal ATE setting for that position (i.e. for a normal setting of 0° , the camber would be +1.5° with the spare installed).

TEST INFORMATION

Duration: Passenger tires 45,000 mi.

Compact spare One tire right front position for 3,000 mi.; two tires rear position 3,000 mi. each.

Routing:

Course		Per Shift Speed	%	Laps	Distance(mi.)
Track	(Outside Lane)	70	59	45	320
	(Inside Lane)	55	38	29	206
Highway		-	-	-	-
City		-	-	-	-
Gravel*		25	3	15	19
Cobblestone		-	-	-	-
Other		-	-	-	-
TOTAL		-	100.0	-	545

* On compact spares, run gravel at end of shift.

Test Sequence: The test sequence is varied depending on the number of vehicles running on a particular test schedule. All vehicles on the same test run the same sequence, but each test may have a different sequence depending on traffic conditions. The sequence may differ, but the overall routing will be the same for each test.

Alternation Schedule: Daily

Rotation Schedule: Hold

Stops/Accels./Decels.: None

Special Instructions: None

INSPECTIONS

Photographs:	0 mi.	**Alignments:**	0 mi.
(four tires in one	5,000 mi.		5,000 mi.
photograph)	10,000 mi.		10,000 mi.
	15,000 mi.		15,000 mi.
	20,000 mi.		20,000 mi.
	25,000 mi.		25,000 mi.
	30,000 mi.		30,000 mi.
	35,000 mi.		35,000 mi.
	40,000 mi.		40,000 mi.
	45,000 mi. (final)		45,000 mi. (final)
Skid Loss	0 mi.	**Holography:**	0 mi.
Measurements:	5,000 mi.		5,000 mi.
	10,000 mi.		10,000 mi.
	15,000 mi.		15,000 mi.
	20,000 mi.		20,000 mi.
	25,000 mi.		25,000 mi.
	30,000 mi.		30,000 mi.
	35,000 mi.		35,000 mi.
	40,000 mi.		40,000 mi.
	45,000 mi. (final)		45,000 mi. (final)
Growth	5,000 mi.		
Measurements:	45,000 mi. (final)		

NOTE:

Any category having an asterisk (*) indicated after it should have that information included in the appropriate category or Comments section of the test instruction sheet.

Need GM start up sheets on this test.

On instruction sheet, note that photograph instructions should be marked: "NEG/PRT:FULL (RUSH)"

Compact Spares: The nontest position's road tire's diameter should be representative of road tires expected to be used with the compact spare test tire.

REVISED 3/15/94

INDOOR ATE/VAR.4G - STANDARD LOAD PASSENGER TIRES

(REAR POSITION TIRES)

TEST CODE	- D1R
TEST EQUIPMENT	- T4, T6, & T7 MACHINES AT TIRE TEST LAB
>	
LOAD	- 35 PSI LOAD FROM SOURCE BOOK
INFLATION	- 35 PSI
SPEED	- VARIABLE AS THIS TEST SIMULATES BOTH TRACK AND CITY COURSE TESTING FOR TIRES ON REAR POSITIONS. IT IS RUN AT 98.5% TRACK SPEEDS (70 MPH/112.65 KPH) AND 1.5% CITY COURSE SPEEDS (15MPH/24.14 KPH).
TEMPERATURE	- 70°F ± 5°F
>	
PROCEDURE	- TEST IS RUN BY CONTROLLERS ON T4, T6, & T7 MACHINES AT THE TIRE TEST LAB. SERVICE HISTORIES WERE RECORDED ON TEST VEHICLES AND ARE USED TO SIMULATE "D1" ACUÑA TEST PROCEDURE FOR REAR POSITIONS.
>	
DURATION	- 40,000 MILES (64,372 KILOMETERS)
>	
NOTES	- TIRES ARE TO BE HOLOGRAPHED PRIOR TO SENDING THEM TO INDOOR. THESE TESTS SHOULD BE RUN IN PAIRS.

REVISED : JANUARY 25, 1993

PASSENGER TIRE

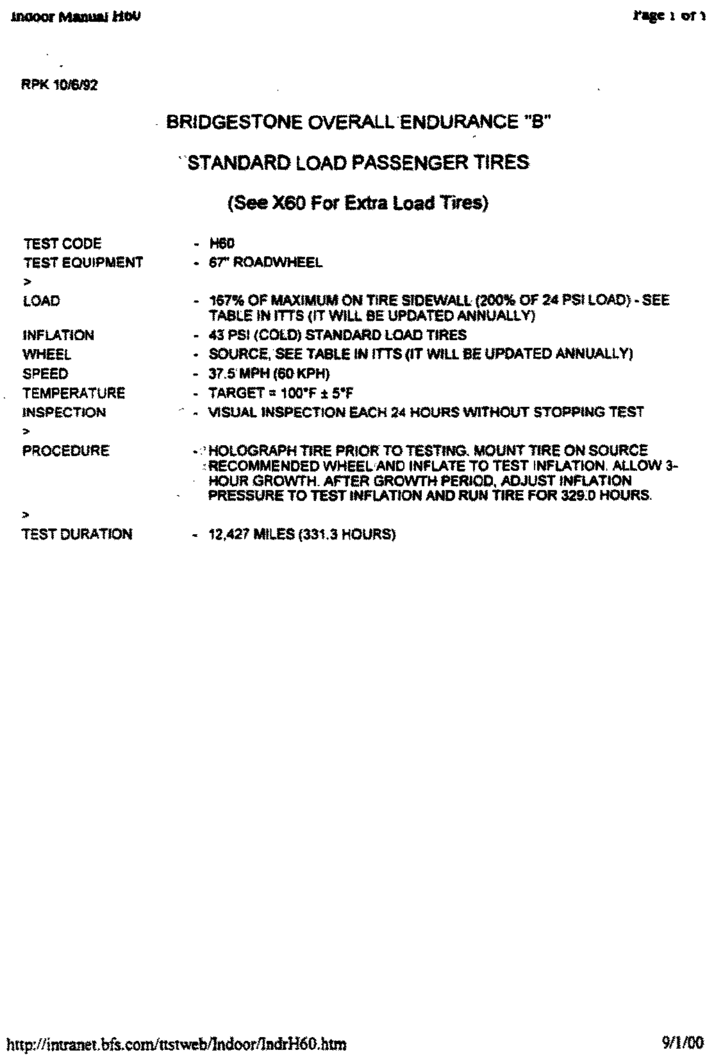
QUALITY ASSURANCE GENERAL DURABILITY TEST

TEST CODE - H6
TEST EQUIPMENT - 67" ROADWHEEL
>
LOAD - VARIABLE-BASED ON MAXIMUM LOAD STAMPED ON TIRE SIDEWALL. SEE CHART BELOW FOR CALCULATIONS.
INFLATION - DIMENSIONAL
SPEED - 50 MPH
TEMPERATURE - 100 ± 5°F
>
PROCEDURE - MOUNT TIRE ON SOURCE RECOMMENDED WHEEL AND INFLATE TO TEST INFLATION.ALLOW 3 HOUR GROWTH PERIOD AT TEST ROOM TEMPERATURE.AFTER GROWTH ADJUST PRESSURE AND BEGIN TEST. –
>

MAX. PERMISSIBLE INFL. PRESS.	END. TEST INFL. PRESS.	MAXIMUM LOAD SPECIFIED ON TIRE						
		4 HR.	6 HR.	24 HR.	8 HR. 130%	8 HR. 145%	8 HR. 160%	8 H 17
32 PSI	24 PSI	85%	90%	100%	4 HR. LOAD	4 HR. LOAD	4 HR. LOAD	4 H LO
35 PSI	26 PSI	"	"	"	"	"	"	.
36 PSI	28 PSI	"	"	"	"	"	"	.
40 PSI	32 PSI	"	"	"	"	"	"	.
41 PSI	32 PSI	"	"	"	"	"	"	.
60 PSI	52 PSI	"	"	"	"	"	"	.

>

(DO NOT READJUST INFLATION PRESSURE DURING TEST)
>
(INTERRUPTION OF TEST AFTER 34 HOURS SHOULD OCCUR AT THE END STEP)
>
TEST DURATION - RUN TO FAILURE AT LAST STAGE
>
NOTE - THIS TEST WAS REVISED JAN. 25, 1993. THE LOADS ARE NOW BASED ON LOAD AS STATED ON TIRE SIDEWALL. THE PREVIOUS TEST LOADS WERE AT DIMENSIONAL LOAD.



RPK 10/6/92

BRIDGESTONE OVERALL ENDURANCE "B"

STANDARD LOAD PASSENGER TIRES

(See X60 For Extra Load Tires)

TEST CODE	- H60
TEST EQUIPMENT	- 67" ROADWHEEL
>	
LOAD	- 167% OF MAXIMUM ON TIRE SIDEWALL (200% OF 24 PSI LOAD) - SEE TABLE IN ITTS (IT WILL BE UPDATED ANNUALLY)
INFLATION	- 43 PSI (COLD) STANDARD LOAD TIRES
WHEEL	- SOURCE, SEE TABLE IN ITTS (IT WILL BE UPDATED ANNUALLY)
SPEED	- 37.5 MPH (60 KPH)
TEMPERATURE	- TARGET = 100°F ± 5°F
INSPECTION	- VISUAL INSPECTION EACH 24 HOURS WITHOUT STOPPING TEST
>	
PROCEDURE	- HOLOGRAPH TIRE PRIOR TO TESTING. MOUNT TIRE ON SOURCE RECOMMENDED WHEEL AND INFLATE TO TEST INFLATION. ALLOW 3-HOUR GROWTH. AFTER GROWTH PERIOD, ADJUST INFLATION PRESSURE TO TEST INFLATION AND RUN TIRE FOR 329.0 HOURS.
>	
TEST DURATION	- 12,427 MILES (331.3 HOURS)

RPK 10/6/92

BRIDGESTONE OVERALL ENDURANCE "C"

PASSENGER TIRES

TEST CODE	- H63
TEST EQUIPMENT	- 67" ROADWHEEL
>	
LOAD	- 100% MAXIMUM. RUN TEST FOR TWO HOURS. IF SIDEWALL IS TOUCHING ROADWHEEL, REDUCE LOAD BY 10%; IF SIDEWALL IS TOUCHING ROADWHEEL, REDUCE LOAD ANOTHER 10%. BE SURE TO NOTE LOAD CHANGES ON BACK OF TEST SHEET.
INFLATION	- 14 PSI (COLD) - NO ADJUSTMENTS
WHEEL	- SOURCE - SEE TABLE IN ITTS (IT WILL BE UPDATED ANNUALLY)
SPEED	- 37.5 MPH (60 KPH)
TEMPERATURE	- TARGET = 100°F ± 5°F
>	
PROCEDURE	- MOUNT TIRE ON SOURCE RECOMMENDED WHEEL AND INFLATE TO TEST INFLATION. ALLOW 3-HOUR GROWTH. AFTER GROWTH PERIOD, ADJUST INFLATION PRESSURE TO TEST INFLATION AND RUN TEST.
>	
INSPECTION	- VISUAL INSPECTION EACH 24 HOURS WITHOUT STOPPING TEST
>	
TEST DURATION	- 6,213 MILES (10,000 KILOMETERS)

ISSUED JAN. 1995

BRIDGESTONE OXYGEN AGED BELT EDGE SEPARATION

PASSENGER TIRES

(T SHI 290)

TEST CODE - S75
TEST EQUIPMENT - T4, T6, T7, & ATE MACHINES
>
LOAD - 85% OF MAXIMUM
LATERAL FORCE - 1. HALF AMPLITUDE OF SIDE FORCE: TEST LOAD X 0.35
2. SIDE FORCE LOADING TIME: 19 SECONDS
3. TRANSITIONAL TIME: 2 SECONDS
4. SIDE FORCE 0 TIME: 19 SECONDS
INFLATION - OXYGEN AGING = 350 KPA (51PSI)
DRUM TESTING = 220 KPA (32 PSI)
SPEED - 90 KPH (56 MPH)
WHEEL - DESIGN
TEMPERATURE - FOR AGING: 60°C ± 3°C (140°F)
FOR DRUM TEST: 38°C ± 3°C (100°F)
>
PROCEDURE - THERE TWO PARTS TO THIS TEST:
>
PART 1 = OXYGEN AGING OF THE TIRE/WHEEL ASSEMBLY
PART 2 = DRUM TESTING OF THE MOUNTED ASSEMBLY
>
PART 1:

NOTE THAT GREASE AND OIL ARE EXTREMELY FLAMMABLE WHEN PLACED IN CONTACT WITH 100% OXYGEN. AS WE WILL BE USING 100% OXYGEN, GREASE AND OIL ON WHEELS, GLOVES, AND TIRES IS TO BE AVOIDED. MOUNT THE TIRE ON A CLEAN WHEEL AND, USING AIR LINE AT MOUNTING MACHINE, SEAT BOTH TIRE BEADS. REMOVE AIR LINE AND ALLOW ALL AIR TO ESCAPE FROM TIRE. INSTALL VALVE CORE, OR THERMOCOUPLE, AND INFLATE TIRE WITH OXYGEN TO 350 KPA (51PSI). INSPECT ALL CONNECTIONS FOR LEAKS. PLACE MOUNTED ASSEMBLIES IN OXYGEN AGING CHAMBER AT 60°C ± 3C° (140°F) FOR 7 DAYS. AFTER 7 DAYS, REMOVE TIRE ASSEMBLY FROM CHAMBER AND REMOVE VALVE CORE, OR THERMOCOUPLE, AND ALLOW ALL OXYGEN TO ESCAPE. REPLACE VALVE CORE, OR THERMOCOUPLE, AND REINFLATE TIRE WITH AIR TO 220 KPA (32 PSI).
>
PART 2:

MOUNT TEST ASSEMBLY ON TEST MACHINE AND AFTER 3-HOUR GROWTH PERIOD, ADJUST INFLATION TO 32 PSI. MEASURE THE SIDE FORCE AT ZERO SLIP ANGLE AT TEST LOAD AND SPEED INDICATED FOR THIS TIRE TO CHECK LATERAL FORCE DEVIATION. IMPLEMENT THE ACTUAL RUN AT THE RUNNING MODE SPECIFIED IN THE TEST CONDITIONS. AFTER STARTING THE ACTUAL RUN, MEASURE THE SLIP ANGLES EVERY 24 HOURS AND CONDUCT TIRE APPEARANCE INSPECTIONS.

>

TEST DURATION - 20,000 KILOMETERS (12.430 MILES)

>

REF. STANDARDS - THE SPECIFICATIONS SHALL CONFORM WITH THE LATEST STANDARDS ACCORDING TO THE FOLLOWING ORDER OF PRIORITY:

1. ISO(4000-1)
2. JATMA
3. TRA
4. ETRTO

NEW 03/06/00

OXYGEN AGED BELT EDGE SEPARATION

PASSENGER TIRES

TEST CODE - S77
TEST EQUIPMENT - T4, T6, T7, & ATE MACHINES
>
LOAD - 85% OF MAXIMUM
LATERAL FORCE - 1. HALF AMPLITUDE OF SIDE FORCE: TEST LOAD X 0.35
2. SIDE FORCE LOADING TIME: 19 SECONDS
3. TRANSITIONAL TIME: 2 SECONDS
4. SIDE FORCE 0 TIME: 19 SECONDS
INFLATION - OXYGEN AGING = 350 KPA (51PSI)
DRUM TESTING = 220 KPA (32 PSI)
SPEED - 90 KPH (56 MPH)
WHEEL - DESIGN
TEMPERATURE - FOR AGING: 60°C ± 3°C (140°F)
FOR DRUM TEST: 38°C ± 3°C (100°F)
>
PROCEDURE - THERE TWO PARTS TO THIS TEST:
>
PART 1 = OXYGEN AGING OF THE TIRE/WHEEL ASSEMBLY
PART 2 = DRUM TESTING OF THE MOUNTED ASSEMBLY
>

PART 1:

NOTE THAT GREASE AND OIL ARE EXTREMELY FLAMMABLE WHEN PLACED IN CONTACT WITH 100% OXYGEN. AS WE WILL BE USING 100% OXYGEN, GREASE AND OIL ON WHEELS, GLOVES, AND TIRES IS TO BE AVOIDED. MOUNT THE TIRE ON A CLEAN WHEEL AND, USING AIR LINE AT MOUNTING MACHINE, SEAT BOTH TIRE BEADS. REMOVE AIR LINE AND ALLOW ALL AIR TO ESCAPE FROM TIRE. INSTALL VALVE CORE, OR THERMOCOUPLE, AND INFLATE TIRE WITH OXYGEN TO 350 KPA (51PSI). INSPECT ALL CONNECTIONS FOR LEAKS. PLACE MOUNTED ASSEMBLIES IN OXYGEN AGING CHAMBER AT 60°C ± 3C° (140°F) FOR 7 DAYS. AFTER 7 DAYS, REMOVE TIRE ASSEMBLY FROM CHAMBER AND REMOVE VALVE CORE, OR THERMOCOUPLE, AND ALLOW ALL OXYGEN TO ESCAPE. REPLACE VALVE CORE, OR THERMOCOUPLE, AND REINFLATE TIRE WITH AIR TO 220 KPA (32 PSI).

>

PART 2:

MOUNT TEST ASSEMBLY ON TEST MACHINE AND AFTER 3-HOUR GROWTH PERIOD, ADJUST INFLATION TO 32 PSI. MEASURE THE SIDE FORCE AT ZERO SLIP ANGLE AT TEST LOAD AND SPEED INDICATED FOR THIS TIRE TO CHECK LATERAL FORCE DEVIATION. IMPLEMENT THE ACTUAL RUN AT THE RUNNING MODE SPECIFIED IN THE TEST CONDITIONS. AFTER STARTING THE ACTUAL RUN, MEASURE THE SLIP ANGLES EVERY 24 HOURS AND CONDUCT TIRE APPEARANCE INSPECTIONS.

TEST DURATION - **6,437 KILOMETERS (4,000 MILES)**

REF. STANDARDS - THE SPECIFICATIONS SHALL CONFORM WITH THE LATEST STANDARDS ACCORDING TO THE FOLLOWING ORDER OF PRIORITY:

1. ISO(4000-1)
2. JATMA
3. TRA
4. ETRTO

NOTES - CORRELATES WITH ACUÑA ATE TEST

REVISED 3/15/94

INDOOR ATE/VAR.4G - STANDARD LOAD PASSENGER TIRES

(FRONT POSITION TIRES)

TEST CODE - D1F
TEST EQUIPMENT - T4 & T6 & T7 MACHINES AT TIRE TEST LAB
>
LOAD - 26 PSI LOAD FROM SOURCE BOOK
INFLATION - 26 PSI
SPEED - VARIABLE AS THIS TEST SIMULATES BOTH TRACK AND CITY COURSE TESTING FOR TIRES ON FRONT POSITIONS. IT IS RUN AT 98.5% TRACK SPEEDS (70MPH/112.65KPH) AND 1.5% CITY COURSE SPEEDS (15MPH/24.14KPH).
TEMPERATURE - 70°F ± 5°F
>
PROCEDURE - TEST IS RUN BY CONTROLLERS ON T4, T6, & T7 MACHINES AT THE TIRE TEST LAB. SERVICE HISTORIES WERE RECORDED ON TEST VEHICLES AND ARE USED TO SIMULATE "D1" ACUÑA TEST PROCEDURE FOR FRONT POSITIONS.
>
DURATION - 40,000 MILES (64,372 KILOMETERS)
>
NOTES - TIRES ARE TO BE HOLOGRAPHED PRIOR TO SENDING THEM TO INDOOR. THESE TESTS SHOULD BE RUN IN PAIRS.

REVISED 10/1/1993

PASSENGER SWEEP TEST

(FIGURE EIGHT SIMULATION)

TEST CODE - S72
TEST EQUIPMENT - T2 MACHINE AT TIRE TEST LAB
>
LOAD - 82.7% OF MAXIMUM LOAD AS STAMPED ON TIRE SIDEWALL
INFLATION - MAXIMUM PSI AS STAMPED ON TIRE SIDEWALL
SPEED - 100 KPH (62MPH)
TEMPERATURE - 100°F ± 5°F
>
PROCEDURE - MOUNT TIRE ON SOURCE RECOMMENDED WHEEL AND INFLATE TO TEST INFLATION. ALLOW 3-HOUR GROWTH. AFTER GROWTH PERIOD, ADJUST INFLATION PRESSURE TO TEST INFLATION AND RUN TEST AS FOLLOWS:
>
HOLOGRAPH TIRE PRIOR TO TESTING TO ASSURE NO VOIDS ARE IN TIRE.
>
BREAK-IN: NONE
>
TEST: PROGRAM IS SET UP IN CONTROL COMPUTER THAT CONTROLS T7, TO SIMULATE FIGURE EIGHT TEST COURSE. THIS IS DONE BY REPEATING THE FOLLOWING 4-STEP SEQUENCE:

STEP 1. TIRE LOAD = 82.7% OF MAXIMUM ON SIDEWALL
SLIP ANGLE = 0 DEGREES
TIME = 7.5 SECONDS
STEP 2. TIRE LOAD = 175% OF MAXIMUM ON SIDEWALL
SLIP ANGLE = + 8 DEGREES
TIME = 7.94 SECONDS
STEP 3. TIRE LOAD = 100% OF MAXIMUM ON SIDEWALL
SLIP ANGLE = 0 DEGREES
TIME = 7.5 SECONDS
STEP 4. TIRE LOAD = 25% OF MAXIMUM ON SIDEWALL
SLIP ANGLE = - 8 DEGREES
TIME = 7.94 SECONDS
>
SHOULD THE TIRE RUN THRU THE TEST WITH NO APPARENT FAILURE, IT SHOULD BE HOLOGRAPHED AGAIN BEFORE IT IS SENT TO WING 16 INSPECTION AREA.
>
TEST DURATION - 100 KILOMETERS (62 MILES)* (REVISED 2/21/91)

REVISED 1/5/79

PASSENGER TIRE

TREAD SEPARATION TEST

TEST CODE	-	I4
TEST EQUIPMENT	-	10" ROADWHEEL "R" MACHINES
>		
LOAD	-	88% OF DIMENSIONAL LOAD FOR 70 SERIES TIRES / 75% OF DIMENSIONAL LOAD FOR ALL OTHER BIAS TIRES
INFLATION	-	50 PSI FOR FIRST 6 HOURS / 55 PSI FOR BALANCE OF TEST
SPEED	-	50 MPH
TEMPERATURE	-	100°F ± 5°F
>		
PROCEDURE	-	MOUNT TIRE ON SOURCE RECOMMENDED WHEEL AND INFLATE TO 50 PSI AND START TEST. AFTER 6 HOURS, RECORD CONTAINED AIR TEMPERATURE AND PSI AND ADJUST PSI TO 55. CHECK C.A.T. AND PSI AND RECORD DAILY FOR BALANCE OF TEST, MAINTAINING 55 PSI.
>		
TEST DURATION	-	PER INDIVIDUAL TEST REQUEST.

RPK 09/18/92

PASSENGER TIRE

OVEN AGED TREAD SEPARATION TEST

TEST CODE - I4A
TEST EQUIPMENT - 10" ROADWHEEL "R" MACHINES
>
LOAD - 88% OF DIMENSIONAL LOAD FOR 70 SERIES TIRES / 75% OF DIMENSIONAL L
INFLATION - 50 PSI FOR FIRST 6 HOURS / 55 PSI FOR BALANCE OF TEST
SPEED - 50 MPH
TEMPERATURE - 100°F ± 5°F
>
PROCEDURE - AGE UNMOUNTED TIRE FOR 14 DAYS AT 158°, MOUNT TIRE ON SOURCE REC
START TEST. AFTER 6 HOURS, RECORD CONTAINED AIR TEMPERATURE AN
AND PSI AND RECORD DAILY FOR BALANCE OF TEST MAINTAINING 55 PSI.
>
TEST DURATION - PER INDIVIDUAL TEST REQUEST.

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Firestone
SINCE 1900
100TH
ANNIVERSARY

ANNUAL SALES ENGINEERING MEETING
NASHVILLE, TN
FEBRUARY 25, 2000

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[illegible], TN
[illegible] 2000

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TOPICS

- 1999 VS 1998 YEAR END ADJUSTMENTS
  - FIRESTONE PASSENGER
    - BY SERVICE GROUP
    - BY PATTERN
  - FIRESTONE LIGHT TRUCK - RECREATIONAL
    - BY SERVICE GROUP
    - BY PATTERN
- RELATED ISSUES
  - NEW ADVERTISING PROGRAM
  - NEW FIRESTONE DATABOOK
  - NEW PRODUCT INTRODUCTION

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END
FIRESTONE LT TRUCK - REC - BY SERVICE GROUP

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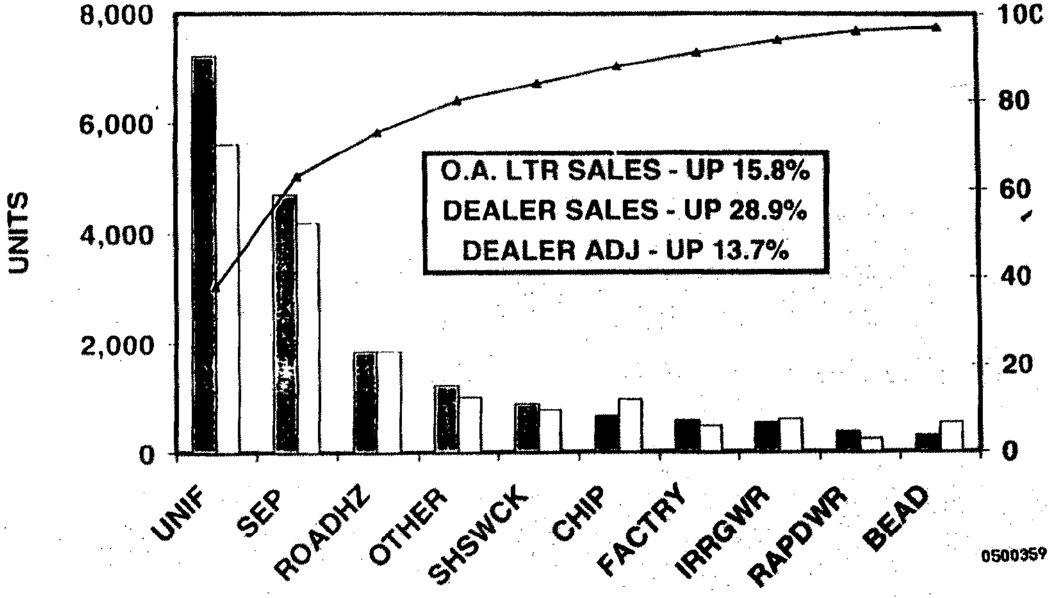

CURRENT 18848 $1,024,192
PREVIOUS 16574 $829,793

NO STORE OR SALE ADJUSTMENTS

UNIFORMITY
TOO HIGH

OOR - UP 24.6%
HARSH RIDE - UP 58.8%
CONICITY - UP 44.1%

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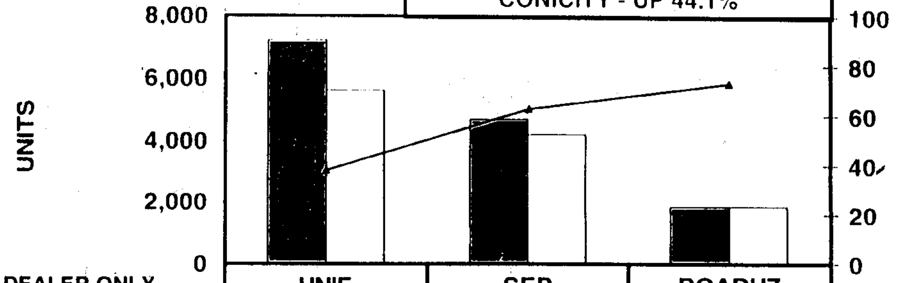
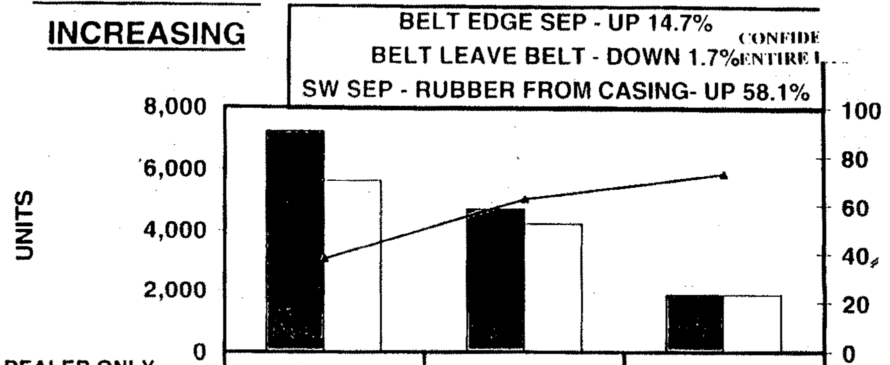


DEALER ONLY	UNIF	SEP	ROADHZ
▇ CURRENT	7221	4694	1846
☐ PREVIOUS	5607	4200	1846
%CHG	28.8	11.8	0
CURR $/ADJ	$78.02	$37.72	$25.59
PREV $/ADJ	$68.98	$38.08	$29.02
─▲─ % OF TOTAL	38	63	73

SEPARATIONS INCREASING



BELT EDGE SEP - UP 14.7%
BELT LEAVE BELT - DOWN 1.7%
SW SEP - RUBBER FROM CASING- UP 58.1%

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ENTIRE

DEALER ONLY	UNIF	SEP	ROADHZ
■ CURRENT	7221	4694	1846
☐ PREVIOUS	5607	4200	1846
%CHG	28.8	11.8	0
CURR $/ADJ	$78.02	$37.72	$25.59
PREV $/ADJ	$68.98	$38.08	$29.02
—♦— % OF TOTAL	38	63	73

SEPARATIONS

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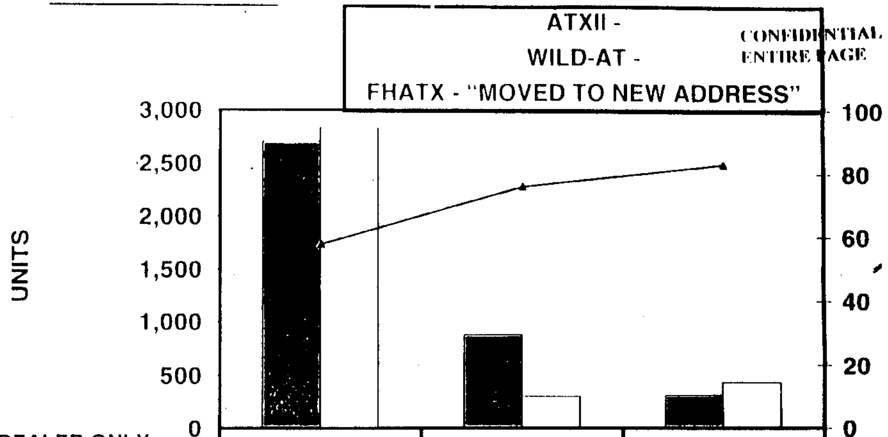

DEALER ONLY

	ATXII	WILD-AT	FHATX
■ CURRENT	2702	885	313
□ PREVIOUS	2832	301	438
%CHG	-4.6	194	-28.5
—◆— % OF TOTAL	58	76	83

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END
FIRESTONE LT TRUCK - REC - BY PATTERN -

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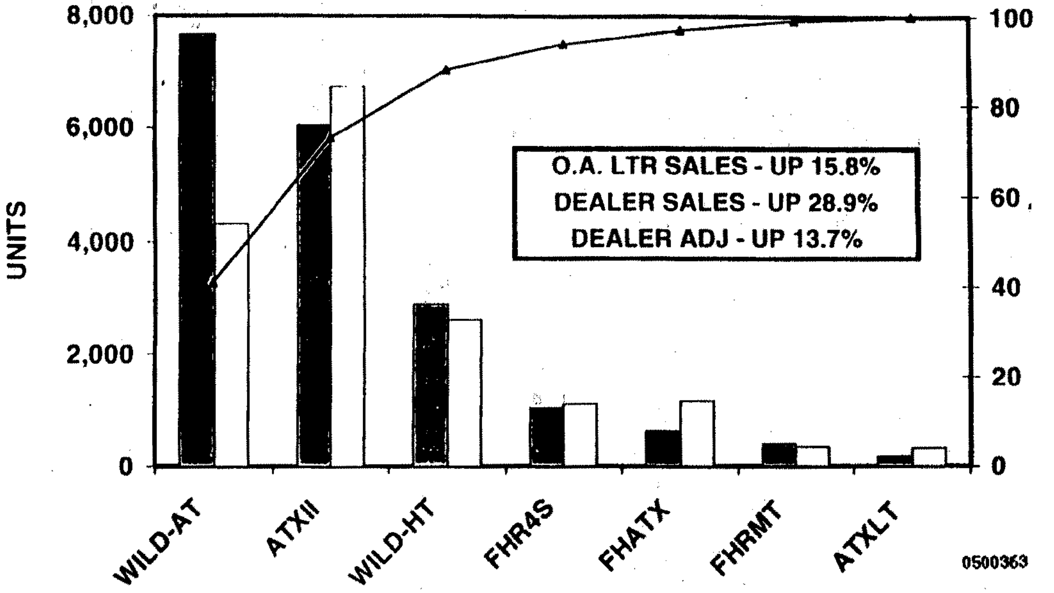

0500363

NO STORE OR SALE ADJUSTMENTS

CURRENT 18848 $1,024,192
PREVIOUS 16574 $829,793

WILD-AT ADJUST.
GROWING QUICKLY

UNIF - UP 95.7% - O.O.R.
RH - UP 35.9% - SW PUNCT & TRD PUNCT
SEP - UP - BELT EDGE SEP

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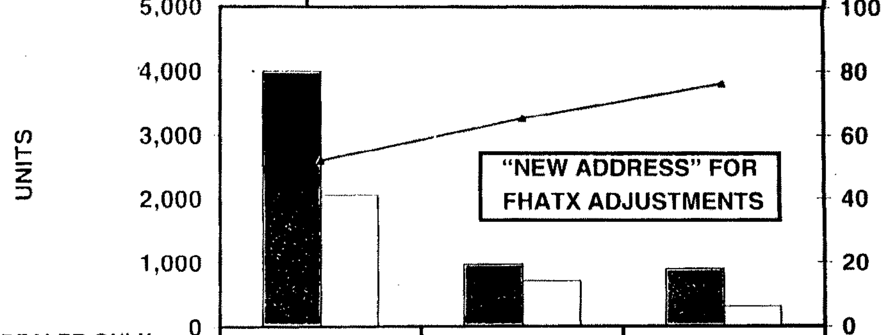

DEALER ONLY

	UNIF	ROADHZ	SEP
▇ CURRENT	4008	957	885
☐ PREVIOUS	2048	704	301
%CHG	95.7	35.9	194
—▲— % OF TOTAL	52	65	76

RAD ATXII
MOVING DOWN

SEP - DOWN 4.6% - BELT EDGE SEP
UNIF - DOWN 11.9% - O.O.R.
SHSWCRK - DOWN 9.4% - WSW CIRCUMF CRK

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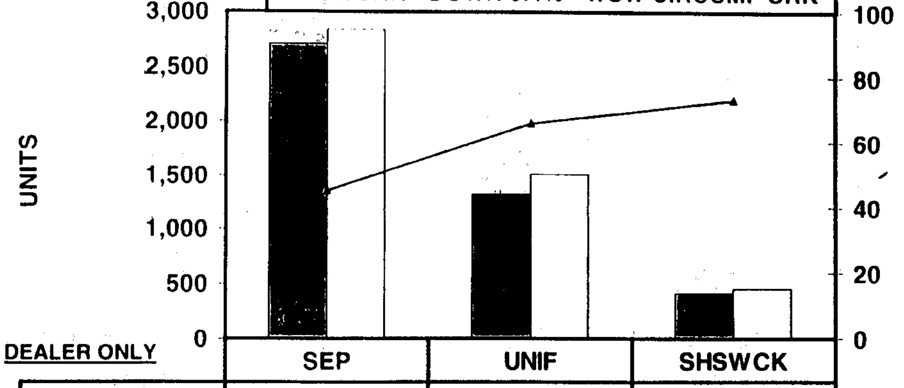

DEALER ONLY

	SEP	UNIF	SHSWCK
■ CURRENT	2702	1325	413
☐ PREVIOUS	2832	1504	456
%CHG	-4.6	-11.9	-9.4
—♦— % OF TOTAL	45	66	73

WILD-HT ADJUST.
ALSO GROWING

UNIF - UP 19.2% - O.O.R.
RH - DOWN 10.8% - TRD PUNCT & RUNFLAT
SEP - UP - BELT EDGE SEP

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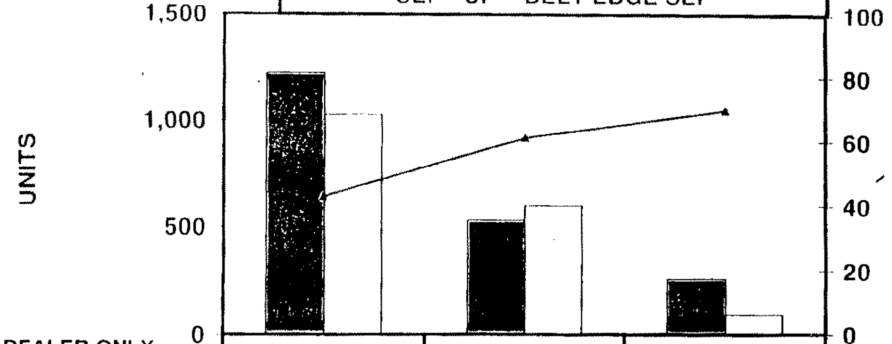

DEALER ONLY

	UNIF	ROADHZ	SEP
■ CURRENT	1224	536	263
☐ PREVIOUS	1027	601	91
%CHG	19.2	-10.8	189
─◆─ % OF TOTAL	43	61	70

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FIRESTONE

IMAGE & FHSS20

PRINT ADVERTISING &

TELEVISION COMMERCIAL

AT LAS VEGAS MOTOR SPEEDWAY

DECEMBER, 1999

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Firestone®

SINCE 1900

ANNIVERSARY

ANNUAL SALES ENGINEERING MEETING
NASHVILLE, TN
FEBRUARY 25, 2000

CRITICAL PERFORMANCE ISSUES

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END

O.A. LTR SALES - UP 15.8%
DEALER SALES - UP 28.9%
DEALER ADJ - UP 13.7%

FIRESTONE LIGHT TRUCK - RECREATIONAL
- BY SERVICE GROUP -

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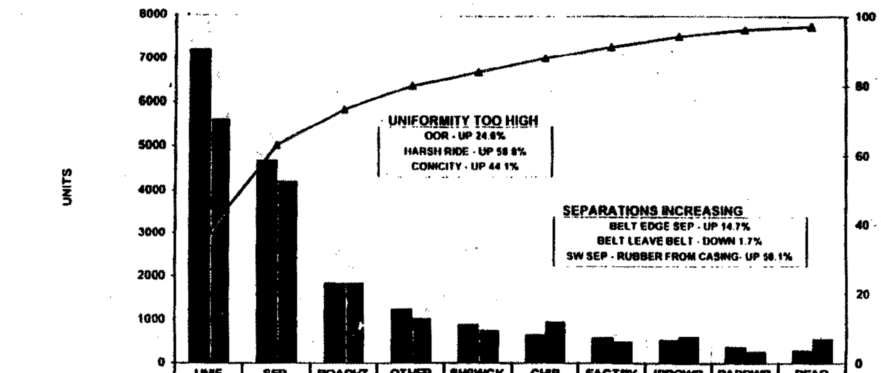

	UNIF	SEP	ROADHZ	OTHER	SHSWCK	CHIP	FACTRY	IRRGWR	RAPDWR	BEAD
▬ CURRENT	7221	4694	1846	1230	898	655	573	535	358	298
▬ PREVIOUS	5607	4200	1846	1017	770	955	482	599	252	541
%CHG	28.8	11.8	0	20.9	16.6	-31.4	18.9	-10.7	42.1	-44.9
CURR $/ADJ	$78.02	$37.72	$25.59	$66.49	$40.17	$41.29	$65.59	$32.41	$25.60	$39.19
PREV $/ADJ	$68.98	$38.08	$29.02	$53.29	$39.61	$53.83	$65.40	$35.37	$27.11	$36.35
—▲— % OF TOTAL	38	63	73	80	84	88	91	94	96	97

NO STORE OR SALE ADJUSTMENTS.

CURRENT	18848	$1,024,192
PREVIOUS	16574	$829,793

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL

- BY PATTERN -

O.A. LTR SALES - UP 15.8%
DEALER SALES - UP 28.9%
DEALER ADJ - UP 13.7%

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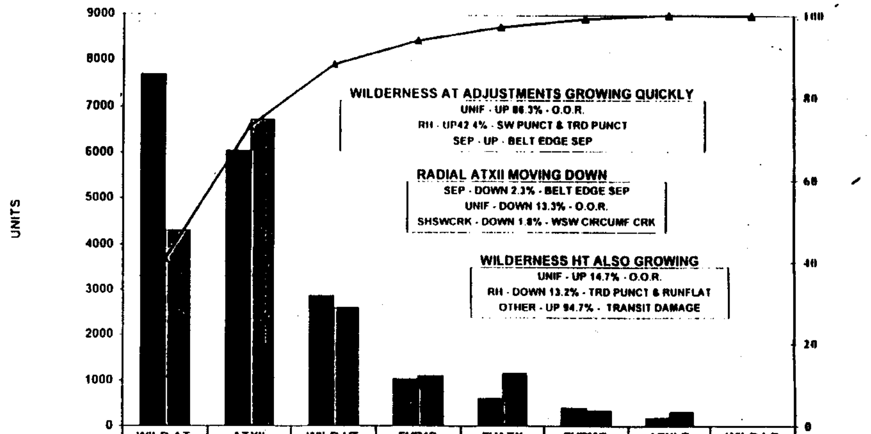

WILDERNESS AT ADJUSTMENTS GROWING QUICKLY
UNIF - UP 86.3% - O.O.R.
RH - UP42.4% - SW PUNCT & TRD PUNCT
SEP - UP - BELT EDGE SEP

RADIAL ATXII MOVING DOWN
SEP - DOWN 2.3% - BELT EDGE SEP
UNIF - DOWN 13.3% - O.O.R.
SHSWCRK - DOWN 1.8% - WSW CIRCUMF CRK

WILDERNESS HT ALSO GROWING
UNIF - UP 14.7% - O.O.R.
RH - DOWN 13.2% - TRD PUNCT & RUNFLAT
OTHER - UP 94.7% - TRANSIT DAMAGE

	WILD-AT	ATXII	WILD-HT	FHR4S	FHATX	FHRMT	ATXLT	WILD-LE
CURRENT	7692	6064	2877	1026	611	384	183	9
PREVIOUS	4301	6737	2598	1097	1150	350	309	0
%CHG	78.8	-10	10.7	-6.5	-46.9	9.7	-40.8	0
% OF TOTAL	41	73	88	94	97	99	100	100

NO STORE OR SALE ADJUSTMENTS

CURRENT	18848	$1,024,192
PREVIOUS	16574	$829,793

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FIRESTONE
LT RECREATIONAL ADJUSTMENT ANALYSIS
1999 YEAR END

JANUARY 2000

SUMMARY
FIRESTONE LT RECREATIONAL TIRES - 1999 YEAR END

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CHANGE	DESCRIPTION	1999	1998
↑ 22.9%	OVERALL ADJ. - DOLLARS	$ 1,175,568	$ 956,791
↑ 6.5%	OVERALL ADJ. - UNITS	31,317	29,401
↑ 3.6%	ADJ. AS % OF SALES DOLLARS (ADJ. DOLLARS / SALES DOLLARS	0.27	0.26
↓ 8.0%	ADJ. AS % OF SALES UNITS (ADJ. UNITS / SALES UNITS)	0.32	0.35
↑ 8.5%	**COST / ADJ.** (ADJ. DOLLARS / ADJ. UNITS)	$ 54.34	$ 50.07

** BASED UPON DEALER ADJUSTMENTS ONLY; STORES PAID BUDGET AMOUNT.

UNIFORMITY UPDATE

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PROBLEM	CATEGORY	COMMENTS
UNIFORMITY	O.E. LEVEL QUALITY	O.E. LEVEL UNIFORMITY REQUIREMENTS ARE TIGHTENING – THE GAP BETWEEN O.E. AND TRADE IS WIDENING
UNIFORMITY	O.E. DEALERS	O.E. DEALERS SOLVE RIDE ISSUES WITH O.E LEVEL TIRE REPLACEMENTS – IN THE FUTURE TRADE TIRES WILL NOT SATISFY THESE NEEDS
UNIFORMITY	COST OF ADJUSTMENTS	FS LTR DEALER – 1999 - $561,822
UNIFORMITY	TIRE INSTALLED THEN REMOVED BY DEALER	FS LTR DEALER – 1999 - 7221 **

** RECOMMENDATION

- ADDITIONAL UNIFORMITY IMPROVEMENT

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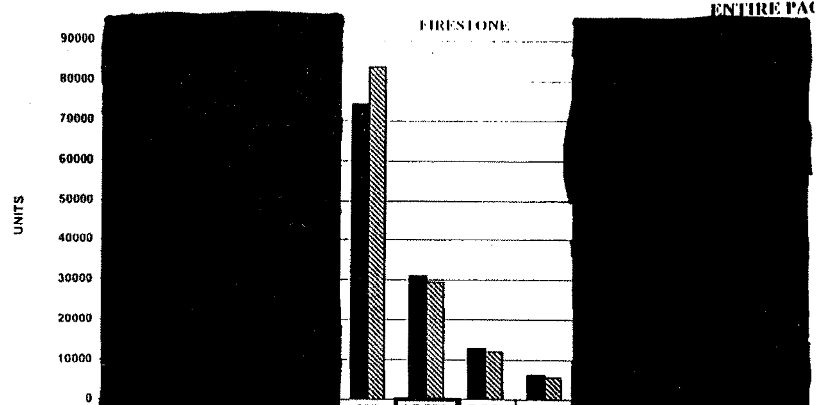
OVERALL BFS UNIT ADJUSTMENTS

JAN-DEC '99 (CURRENT) COMPARED
TO JAN-DEC '98 (PREVIOUS)



[redacted]

[redacted]

		PSR	LT REC	LT COM	TBR	
■ CURRENT	[redacted]	74330	31317	13065	6256	[redacted]
▨ PREVIOUS	[redacted]	83490	29401	11951	5498	[redacted]
%CHG	[redacted]	-11	6.5	9.3	13.8	[redacted]
% TOTAL CURRENT	[redacted]	26.5	11.2	4.7	2.2	[redacted]
% TOTAL PREVIOUS	[redacted]	29.9	10.5	4.3	2	[redacted]
% CHG TOTAL	[redacted]	-11.4	6.1	8.8	13.3	[redacted]

DOES NOT CONTAIN FORD FS LT COM RECALL

REDACTED

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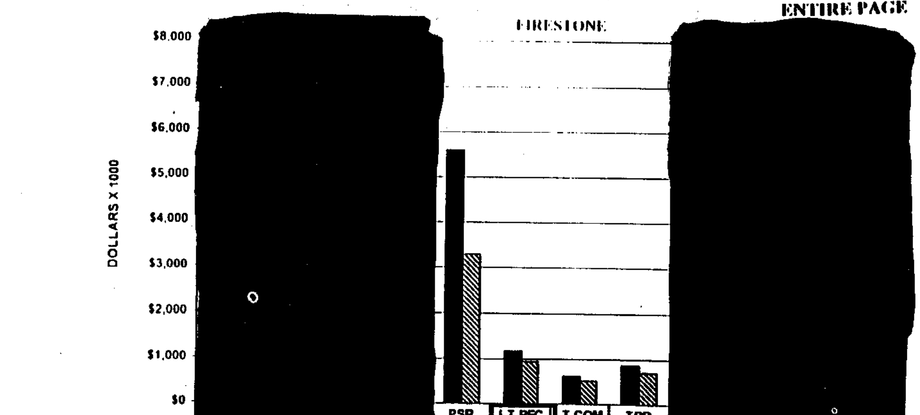
OVERALL BFS DOLLAR ADJUSTMENTS
JAN-DEC '99 (CURRENT) COMPARED TO JAN-DEC '98 (PREVIOUS)

[redacted]



[redacted]

		PSR	LT REC	LT COM	TBR	
■ CURRENT	[redacted]	$5,601	$1,176	$634	$864	[redacted]
▨ PREVIOUS	[redacted]	$3,301	$957	$524	$701	[redacted]
%CHG	[redacted]	69.7	22.9	20.9	23.2	[redacted]
% TOTAL CURRENT	[redacted]	27.9	5.9	3.2	4.3	[redacted]
% TOTAL PREVIOUS	[redacted]	19.3	5.6	3.1	4.1	[redacted]
% CHG TOTAL	[redacted]	44.5	4.6	3	4.9	[redacted]

DOES NOT CONTAIN FORD FS LT COM RECALL

REDACTED

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END

O A LTR SALES - UP 15 8%
DEALER SALES - UP 28 9%
DEALER ADJ - UP 13 7%

FIRESTONE LIGHT TRUCK - RECREATIONAL
BY SERVICE GROUP -

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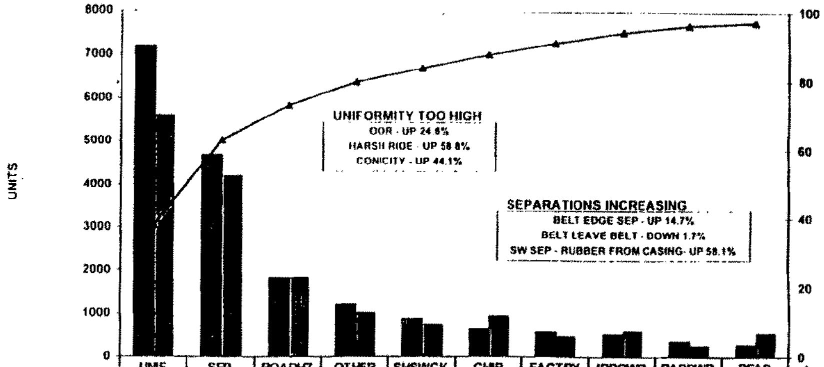

UNIFORMITY TOO HIGH
OOR - UP 24.6%
HARSH RIDE - UP 58.8%
CONICITY - UP 44.1%

SEPARATIONS INCREASING
BELT EDGE SEP - UP 14.7%
BELT LEAVE BELT - DOWN 1.7%
SW SEP - RUBBER FROM CASING- UP 58.1%

	UNIF	SEP	ROADHZ	OTHER	SHSWCK	CHIP	FACTRY	IRRGWR	RAPDWR	BEAD
■ CURRENT	7221	4694	1846	1233	898	655	573	535	358	298
▨ PREVIOUS	5607	4200	1846	1017	770	955	482	599	252	541
%CHG	28.8	11.8	0	20.9	16.6	-31.4	18.9	-10.7	42.1	-44.9
CURR $/ADJ	$78.02	$37.72	$25.59	$56.49	$40.17	$41.29	$65.59	$32.41	$25.60	$39.19
PREV $/ADJ	$68.98	$38.08	$29.02	$53.29	$39.61	$53.83	$65.40	$35.37	$27.11	$36.35
—▲— % OF TOTAL	38	63	73	80	84	88	91	94	96	97

NO STORE OR SALE ADJUSTMENTS

CURRENT	18848	$1,024,192
PREVIOUS	16574	$829,793

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL

- BY PATTERN -

O.A. LTR SALES - UP 15.8%
DEALER SALES - UP 28.9%
DEALER ADJ - UP 13.7%

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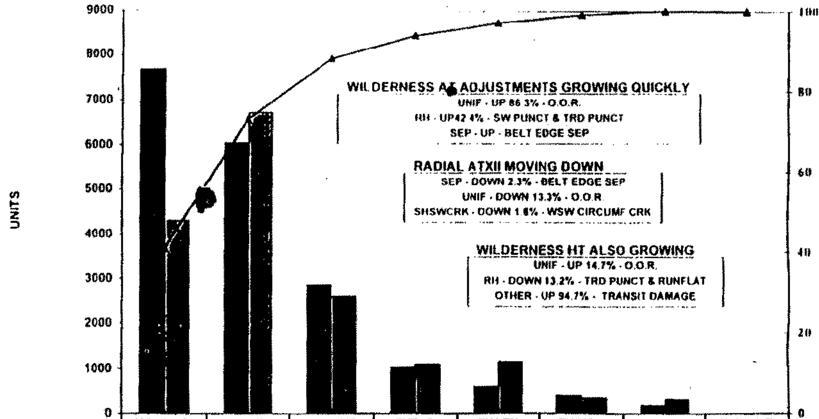

WILDERNESS AT ADJUSTMENTS GROWING QUICKLY
UNIF - UP 86.3% - O.O.R.
RH - UP42.4% - SW PUNCT & TRD PUNCT
SEP - UP - BELT EDGE SEP

RADIAL ATXII MOVING DOWN
SEP - DOWN 2.3% - BELT EDGE SEP
UNIF - DOWN 13.3% - O.O.R.
SHSWCRK - DOWN 1.8% - WSW CIRCUMF CRK

WILDERNESS HT ALSO GROWING
UNIF - UP 14.7% - O.O.R.
RH - DOWN 13.2% - TRD PUNCT & RUNFLAT
OTHER - UP 94.7% - TRANSIT DAMAGE

	WILD-AT	ATXII	WILD-HT	FHR4S	FHATX	FHRMT	ATXLT	WILD-LE
CURRENT	7692	6064	2877	1026	611	384	183	9
PREVIOUS	4301	6737	2598	1097	1150	350	309	0
%CHG	78.8	-10	10.7	-6.5	-46.9	9.7	-40.8	0
% OF TOTAL	41	73	88	94	97	99	100	100

NO STORE OR SALE ADJUSTMENTS.

CURRENT	18846	$1,024,192
PREVIOUS	16574	$829,793

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL

- UNIFORMITY -

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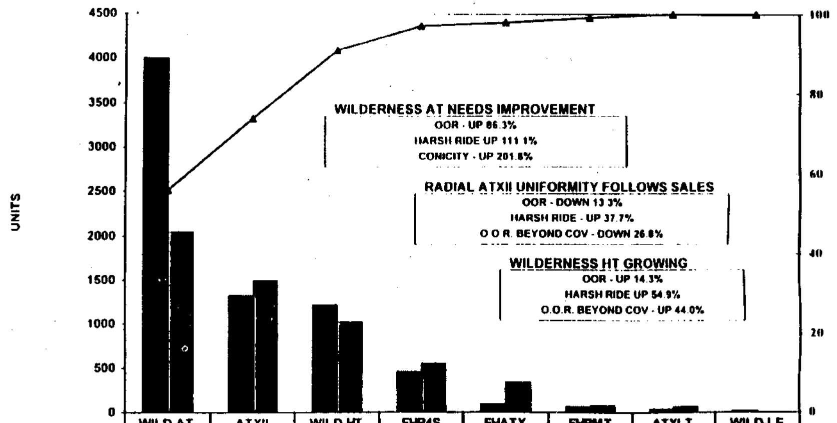
ENTIRE PAGE

DEALER SALES - UP 28.9%
DEALER ADJ UP 13.7%
DEALER UNIF ADJ - UP 28.8%

DEALER UNIF ADJ
OOR - UP [illegible]
HARSH RIDE [illegible]
CONICITY - UP 44.1%



WILDERNESS AT NEEDS IMPROVEMENT
OOR - UP 86.3%
HARSH RIDE UP 111.1%
CONICITY - UP 201.8%

RADIAL ATXII UNIFORMITY FOLLOWS SALES
OOR - DOWN 13.3%
HARSH RIDE - UP 37.7%
O.O.R. BEYOND COV - DOWN 26.8%

WILDERNESS HT GROWING
OOR - UP 14.3%
HARSH RIDE UP 54.9%
O.O.R. BEYOND COV - UP 44.0%

	WILD-AT	ATXII	WILD-HT	FHR4S	FHATX	FHRMT	ATXLT	WILD-LE
■ CURRENT	4008	1325	1224	458	92	62	44	8
■ PREVIOUS	2048	1504	1027	543	339	81	61	0
%CHG	95.7	-11.9	19.2	-15.7	-72.9	-23.8	-27.9	0
—▲— % OF TOTAL	56	74	91	97	98	99	100	100

NO STORE OR SALE ADJUSTMENTS

CURRENT 7221
PREVIOUS 5607

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL
- SEPARATIONS -

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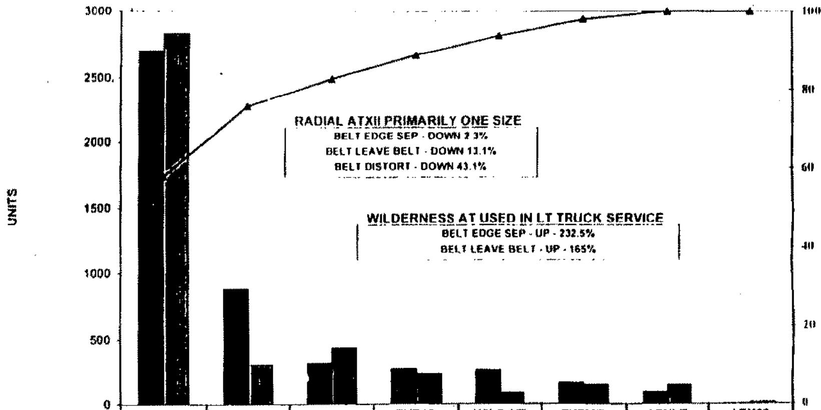
DEALER SALES - UP 28.9 %
DEALER ADJ UP 13.7%
DEALER SEP ADJ - UP 11.8%



DEALER SEP ADJ
BELT EDGE SEP - UP 14.7%
BELT LEAVE BELT - DOWN 1.7%

RADIAL ATXII PRIMARILY ONE SIZE
BELT EDGE SEP - DOWN 2.3%
BELT LEAVE BELT - DOWN 13.1%
BELT DISTORT - DOWN 43.1%

WILDERNESS AT USED IN LT TRUCK SERVICE
BELT EDGE SEP - UP - 232.5%
BELT LEAVE BELT - UP - 165%

	ATXII	WILD-AT	FHATX	FHR4S	WILD-HT	FHRMT	ATXLT	ATX23
■ CURRENT	2702	885	313	270	263	162	99	0
■ PREVIOUS	2832	301	438	238	91	146	144	10
%CHG	-4.6	194	-28.5	13.4	189	11	-31.3	0
▲ % OF TOTAL	58	76	83	89	94	98	100	100

NO STORE OR SALE ADJUSTMENTS

CURRENT 4694
PREVIOUS 4200

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL
- RADIAL ATXII -

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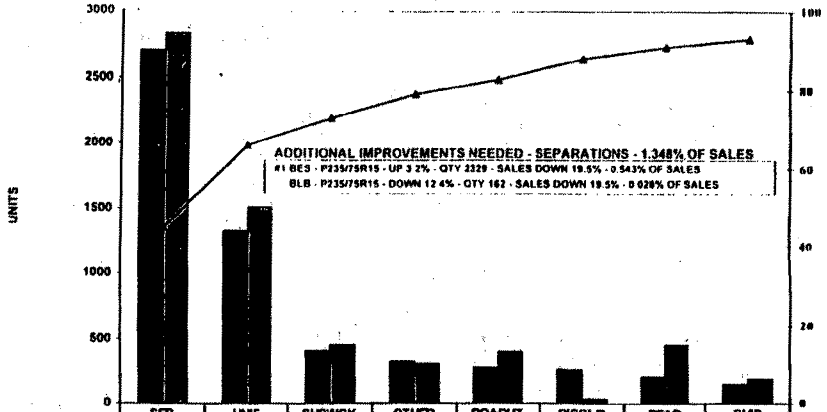
DEALER SALES - UP 28.9 %
DEALER ATXII SALES - DOWN 15.9%
DEALER ATXII ADJ - DOWN 10.0%



ADDITIONAL IMPROVEMENTS NEEDED - SEPARATIONS - 1.348% OF SALES
#1 BES - P235/75R15 - UP 3.2% - QTY 2329 - SALES DOWN 19.5% - 0.543% OF SALES
BLB - P235/75R15 - DOWN 12.4% - QTY 162 - SALES DOWN 19.5% - 0.020% OF SALES

	SEP	UNIF	SHSWCK	OTHER	ROADHZ	DISCLR	BEAD	CHIP
CURRENT	2702	1325	413	326	280	261	206	145
PREVIOUS	2832	1504	456	305	404	38	450	187
%CHG	-4.6	-11.9	-9.4	6.9	-30.7	586.8	-54.2	-22.5
% OF TOTAL	45	66	73	79	83	88	91	93

NO STORE OR SALE ADJUSTMENTS.

CURRENT	6064
PREVIOUS	8737

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL
- WILDERNESS AT -

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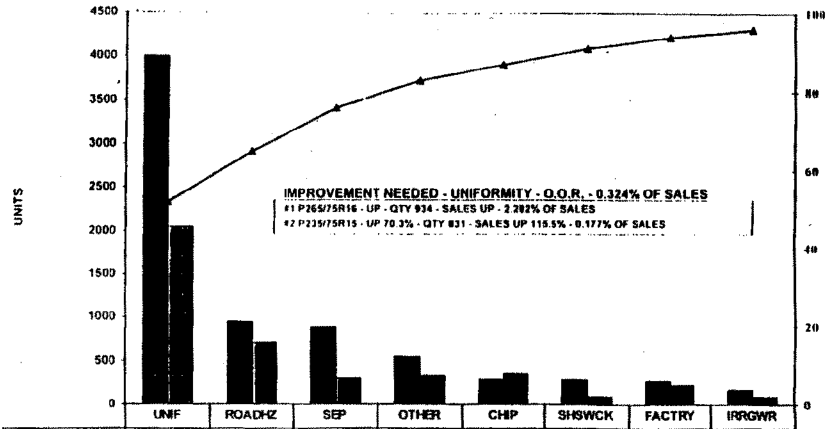
DEALER SALES - UP 28.9 %
DEALER WILD-AT SALES - UP 45.0%
DEALER WILD-AT ADJ - UP 78.8%



IMPROVEMENT NEEDED - UNIFORMITY - O.O.R. - 0.324% OF SALES
#1 P265/75R16 - UP - QTY 934 - SALES UP - 2.202% OF SALES
#2 P235/75R15 - UP 70.3% - QTY 831 - SALES UP 115.5% - 0.177% OF SALES

	UNIF	ROADHZ	SEP	OTHER	CHIP	SHSWCK	FACTRY	IRRGWR
▬ CURRENT	4008	957	885	543	289	287	279	170
▬ PREVIOUS	2048	704	301	322	358	97	218	95
%CHG	95.7	35.9	194	68.6	-19.3	195.9	28	78.9
—▲— % OF TOTAL	52	65	76	83	87	91	94	96

NO STORE OR SALE ADJUSTMENTS.

CURRENT 7692
PREVIOUS 4301

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL
- WILDERNESS HT -

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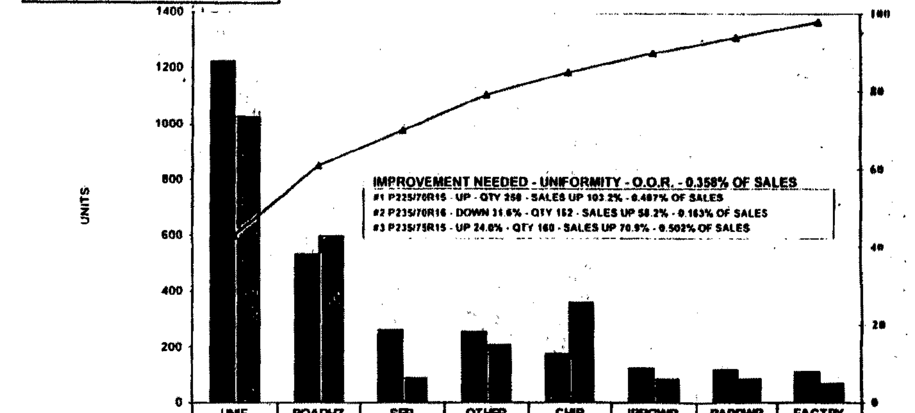
DEALER SALES - UP 28.9%
DEALER WILD HT SALES - UP 41.5%
DEALER WILD HT ADJ - UP 10.7%



IMPROVEMENT NEEDED - UNIFORMITY - O.O.R. - 0.358% OF SALES
#1 P225/70R15 - UP - QTY 258 - SALES UP 103.2% - 0.487% OF SALES
#2 P235/70R16 - DOWN 31.6% - QTY 152 - SALES UP 58.2% - 0.163% OF SALES
#3 P235/75R15 - UP 24.0% - QTY 160 - SALES UP 70.9% - 0.502% OF SALES

	UNIF	ROADHZ	SEP	OTHER	CHIP	IRRGWR	RAPDWR	FACTRY
▬ CURRENT	1224	636	263	257	174	124	118	111
▬ PREVIOUS	1027	601	91	206	363	86	86	67
%CHG	19.2	-10.8	189	25.4	-52.1	44.2	37.2	65.7
—▲— % OF TOTAL	43	61	70	79	85	90	94	98

NO STORE OR SALE ADJUSTMENTS.

CURRENT 2877
PREVIOUS 2590

REDACTED

REDACTED

REDACTED

REDACTED

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL
UNIFORMITY - PRIM SERV COND -

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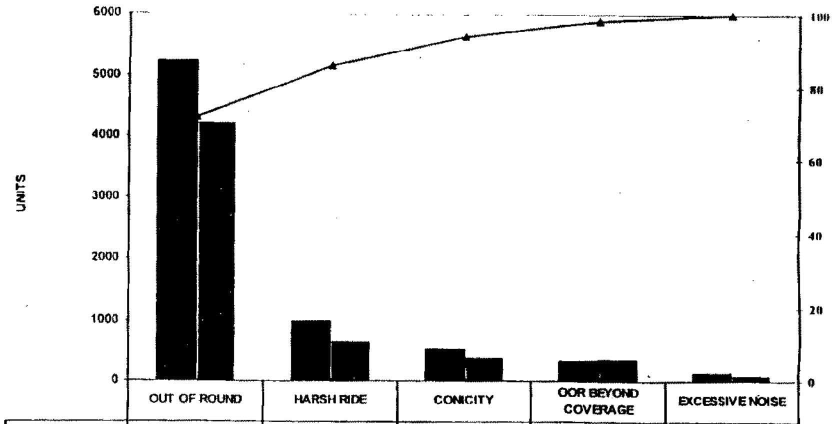

	OUT OF ROUND	HARSH RIDE	CONICITY	OOR BEYOND COVERAGE	EXCESSIVE NOISE
■ CURRENT	5230	999	529	340	123
■ PREVIOUS	4199	629	367	346	66
%CHG	24.6	58.8	44.1	-1.7	86.4
—▲— % OF TOTAL	72	86	94	98	100

NO STORE OR SALE ADJUSTMENTS.

CURRENT	7221
PREVIOUS	5607

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL

- UNIFORMITY - POST DOT 148 -

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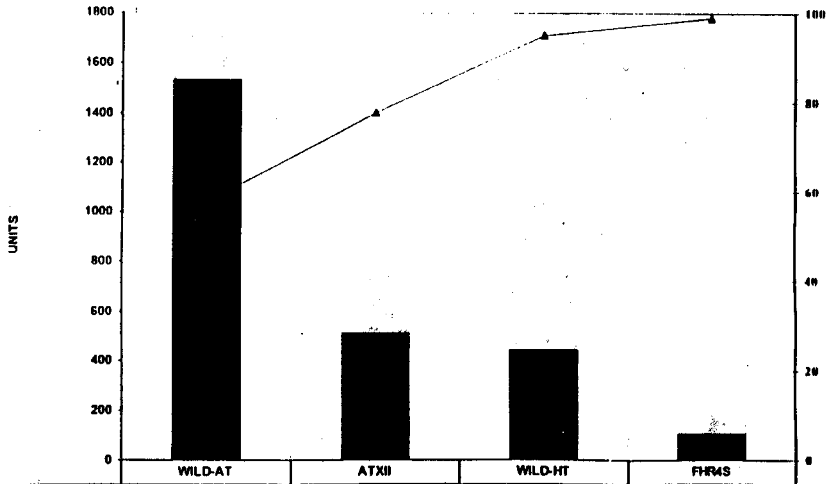

	WILD-AT	ATXII	WILD-HT	FHR4S
▬ CURRENT	1534	513	445	108
—▲— % OF TOTAL	58	78	95	99

NO STORE OR SALE ADJUSTMENTS.

CURRENT 2636

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL
- ROAD HAZARD -

DEALER SALES : UP 12.6%
DEALER ADJ - UP16.7%
DEALER ROADHZ ADJ - UP 2.0%

DEALER ROADHZ ADJ
TRD PUNC
SW PUNCT
RUNFLAT DAMAGE - UP 32.3%

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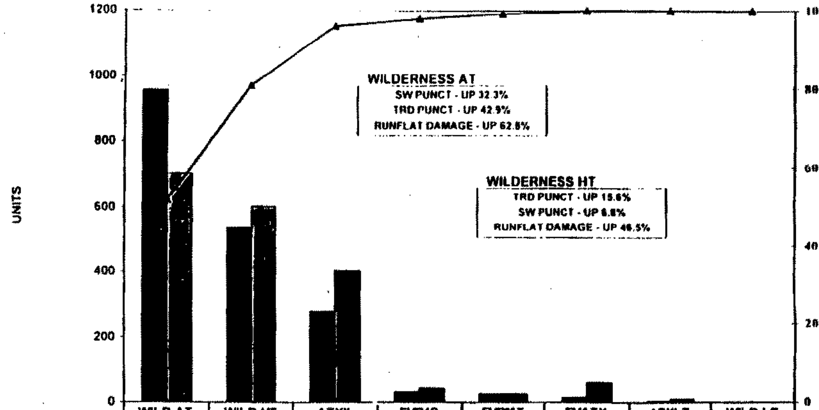

WILDERNESS AT
SW PUNCT - UP 32.3%
TRD PUNCT - UP 42.9%
RUNFLAT DAMAGE - UP 62.8%

WILDERNESS HT
TRD PUNCT - UP 15.6%
SW PUNCT - UP 6.8%
RUNFLAT DAMAGE - UP 46.5%

	WILD-AT	WILD-HT	ATXII	FHR4S	FHRMT	FHATX	ATXLT	WILD-LE
▬ CURRENT	957	536	280	31	24	14	3	1
▬ PREVIOUS	704	601	404	41	25	60	11	0
%CHG	35.9	-10.8	-30.7	-24.4	-4	-76.7	-72.7	0
—▲— % OF TOTAL	52	81	96	98	99	100	100	100

NO STORE OR SALE ADJUSTMENTS.

CURRENT	1846
PREVIOUS	1846

ADJUSTMENT ANALYSIS - 1999 VS 1998 YEAR END

FIRESTONE LIGHT TRUCK - RECREATIONAL
- CHIPPING -

DEALER SALES - UP 12.6%
DEALER ADJ UP 16.7%
DEALER CHIPPING ADJ
- DOWN 37.3%

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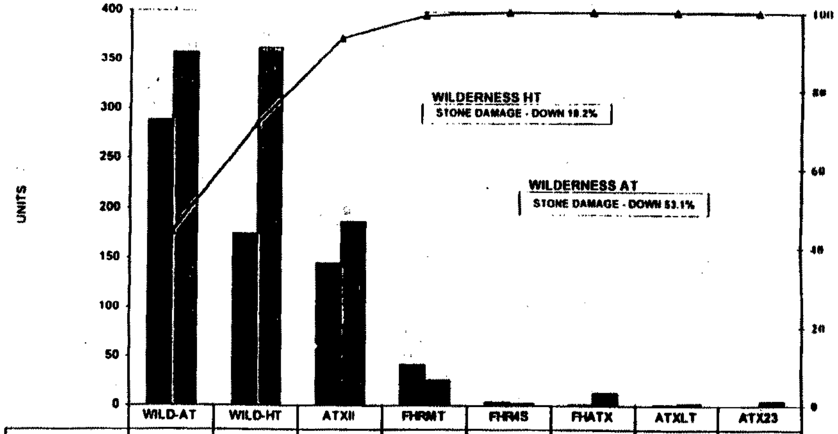
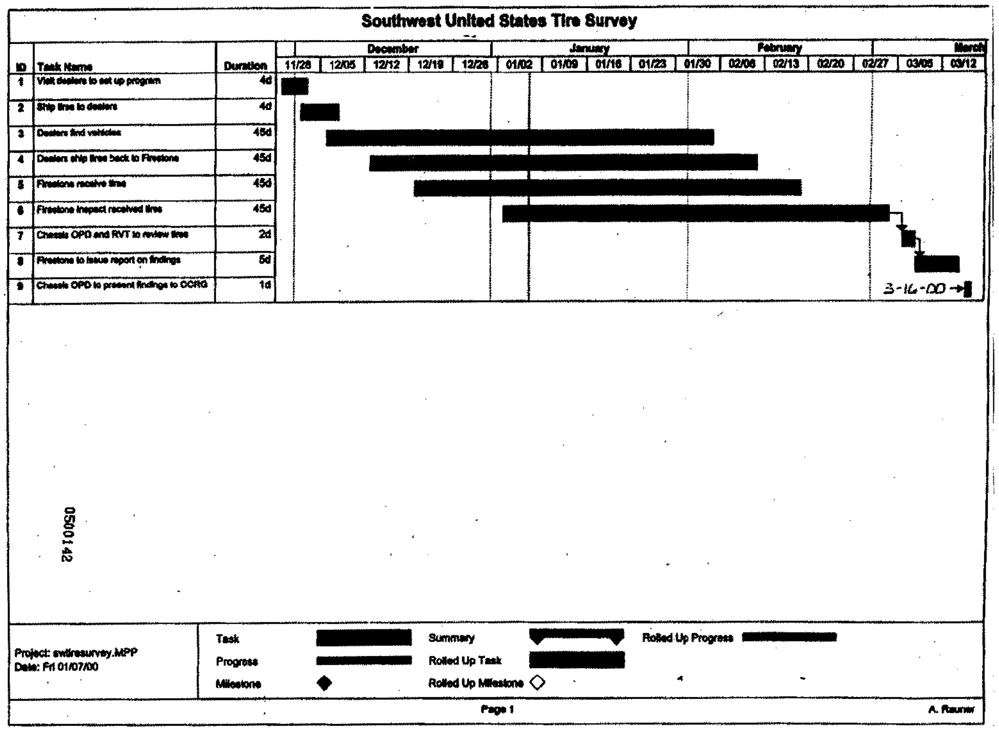


	WILD-AT	WILD-HT	ATXII	FHRMT	FHR4S	FHATX	ATXLT	ATX23
▬ CURRENT	289	174	145	42	3	1	1	0
▬ PREVIOUS	358	363	187	25	2	13	2	5
%CHG	-19.3	-52.1	-22.5	68	50	-92.3	-50	0
—▲— % OF TOTAL	44	71	93	99	100	100	100	100

NO STORE OR SALE ADJUSTMENTS.

CURRENT	655
PREVIOUS	955



Southwest United States Tire Survey

ID	Task Name	Duration
1	Visit dealers to set up program	4d
2	Ship tires to dealers	4d
3	Dealers find vehicles	45d
4	Dealers ship tires back to Firestone	45d
5	Firestone receive tires	45d
6	Firestone inspect received tires	45d
7	Chassis OPD and RVT to review tires	2d
8	Firestone to issue report on findings	5d
9	Chassis OPD to present findings to CCRG	1d

3-16-00 →

0500142

Project: swtiresurvey.MPP
Date: Fri 01/07/00

Page 1

A. Rauner

Supplied to Ford 03/23/00

SW Tire Survey: 243-Tire/64-Vehicle Summary

LOCATION STATS:

Dealer	City	Total	P235/75R15 ST381J	P255/70R16 ST358J	P255/70R16 ST369J	P235/75R15 Trade*
Click	Tucson	36	28		8	
Earnhardt	Tempe	32	20	4	8	
Friendly	Las Vegas	64	32		32	
Gaudin	Las Vegas	61	32		29	
Leadership	Dallas	15	14			1
Tuttle	Tucson	34	26		8	
unknown	unknown	1	1			
	Total	**243**	**153**	**4**	**85**	**1**

City	Total	P235/75R15 ST381J	P255/70R16 ST358J	P255/70R16 ST369J	P235/75R15 Trade*
Dallas	15	14			1
Las Vegas	125	64		61	
Tempe	32	20	4	8	
Tucson	70	54		16	
unknown	1	1			
Total	**243**	**153**	**4**	**85**	**1**

*Firestone Radial ATX aftermarket (trade) tire, P235/75R15

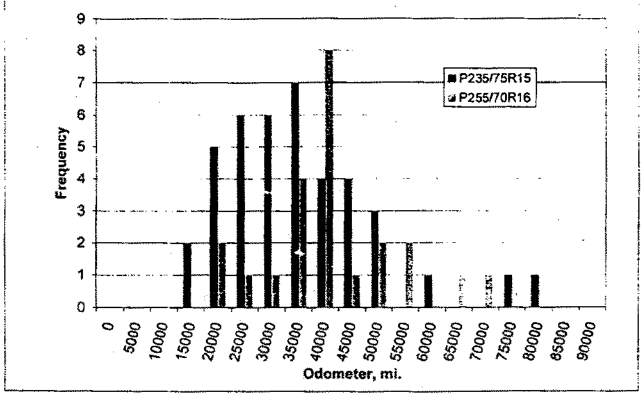
SW Tire Survey: 243-Tire/64-Vehicle Summary

VEHICLE MILEAGE STATS:

Vehicle:

Model Year	Tires	Vehicles	Vehicle Avg. MI	
1995	4	1	72096	
1996	9	3	68144	
1997	84	22	36381	
1998	135	35	29776	
1999	4	1	16078	
Tag Error	2	1	n/a	(Excluded)
No VIN	4	1	47731	
No Tag	1	?	n/a	(Excluded)
Total	**243**	**64**		
			34649	**=avg of vehicles not excluded (63)**

Vehicle Mileage Histogram:



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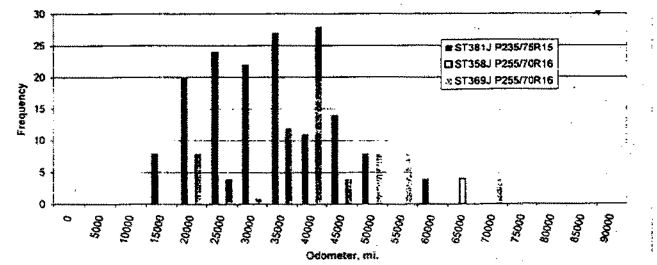
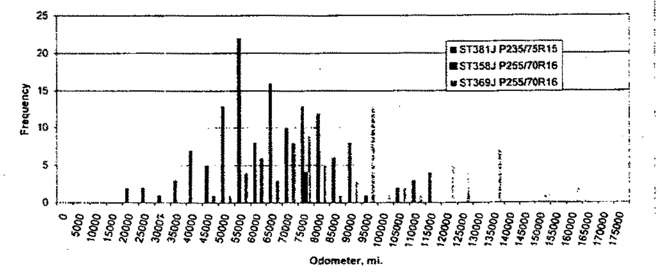
SW Tire Survey: 243-Tire/64-Vehicle Summary

TIRE MILEAGE STATS:

		P235/75R15	P255/70R16	P255/70R16	P235/75R15	
Tires:	**All Tires**	**ST381J**	**ST358J**	**ST369J**	**Trade**	
Reported	32995	29567	60062	37734	n/a	
Projected	72343	63009	77961	88781	n/a	
N	219	138	4	77	0	
Replaced	18	9	0	8	1	(Excluded)
Spares	3	3	0	0	0	(Excluded)
Tag Error	2	2	0	0	0	(Excluded)
No Tag	1	1	0	0	0	(Excluded)



Projected

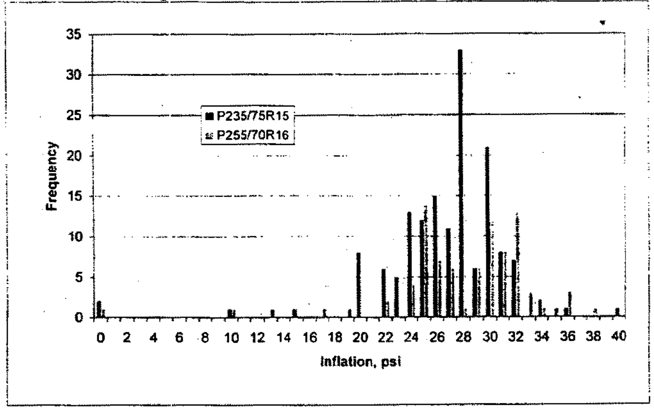


SW Tire Survey: 243-Tire/64-Vehicle Summary

TIRE INFLATION STATS:

		P235/75R15	P255/70R16	P255/70R16	P235/75R15	
	All	**ST381J**	**ST358J**	**ST369J**	**Trade**	
Avg Psi	27.1	26.6	26	28.1	30	
N < 20 psi	9	4		5		
N	240	152	4	83	1	
No Tag	2	1		1		(Excluded)
Tag Error	1			1		(Excluded)

Inflation Pressure Histogram:



Notes:
- -- P235/75R15 vehicle inflation = 26/26 psi
- -- P255/70R16 vehicle inflation = 30/30 psi
- -- 48 (31%) P235/75R15 tires were < 26 psi
- -- 45 (51%) P255/70R16 tires were < 30 psi
- -- 9 tires were < 20 psi

SW Tire Survey: 243-Tire/64-Vehicle Summary

INSPECTION STATS:

	Plug	Patch	Patch & Plug	Object Thru	Object Not Thru	Off Road	Tread Cuts
P235/75R15 **ST381J**	6	23	6	6	8	4	8
P255/70R16 **ST358J**	0	0	0	2	1	0	0
P255/70R16 **ST369J**	1	19	8	6	2	12	5
P235/75R15 **Trade**	0	0	0	0	0	0	0
Total No.	7	42	14	14	11		
Tires	6	33	13	14	11	16	13
% of Tires	2.5%	13.6%	5.3%	5.8%	4.5%	6.6%	5.3%

	Plug	Patch	Patch & Plug	Object Thru	Object Not Thru	Off Road	Tread Cuts	Tires
Dallas	13.0%	20.0%	13.0%	6.6%	6.6%	0.0%	0.0%	15
Las Vegas	2.4%	15.2%	5.6%	6.4%	4.0%	6.4%	6.4%	125
Tempe	0.0%	9.4%	3.1%	9.4%	9.4%	0.0%	0.0%	32
Tucson	1.4%	12.9%	4.3%	4.3%	4.3%	11.4%	7.1%	70

Plug = Improper, exterior application cord repair
Patch = Internal tire patch
Patch & Plug = Internal patch with integral or separate hole plug
Object Thru = Usually nail/screw/staple with penetration completely through tire
Object Not Thru = Usually nail/screw/staple with penetration not completely through tire
Off Road = Tires with some indication of unimproved road use, i.e. gravel
Tread Cuts = Tires with deep cuts in tread area

Notes:

-- Some tires had more than one of, or a combination of, each item above
-- 159 tires (65.4%) had none of the above
-- 52 tires (21.4%) had repair(s)
-- In most cases, objects through the tread (14 tires) were probably leaking
-- In some cases, objects stuck in tread but not through, will eventually penetrate
-- In 3 tires, repairs were made in the shoulder/buttress of the tire (improper area)
-- In 1 tire, an internal patch was loose and probably permitting inflation loss
-- 8 tires were worn out or almost worn out, some with shoulder wipe
-- 1 tire was worn completely through the top steel belt in the shoulder

BRIDGESTONE/FIRESTONE, INC.

To MEMO TO FILE
From ROBERT O. MARTIN
Date April 28, 2000
Reference
Security Class
Subject TIRE SURVEY

Ford requested a survey of Firestone Ford Explorers and Ford dealers in Dallas, Las Vegas, Phoenix, and Tucson were selected to remove tires from trade-in or lease return vehicles. The tires removed were P235/75R15 and P255/70R16 Firestone Wilderness AT tires. The tires were returned to Bridgestone/Firestone's Akron Technical Center for analysis by Bridgestone/Firestone and Ford. Before removing the tires, the dealers recorded the inflation pressure, the VIN Number, the position, and the odometer mileage. A total of 243 tires from 63 vehicles were returned.

The returned tires ranged in mileage from 11320 to 76092. Examination of the tires revealed no tire deficiencies and that the tires performed as expected.

Bridgestone/Firestone appreciates the efforts of the Ford Motor Company for coordinating the return of these tires from the dealers and for the time spent by Ford's engineering staff reviewing tires with us.

Robert O. Martin
Vice President, Corporate Quality Assurance

cc: Deepak Parekh - Ford
Jerry Metters - Ford

SW Tire Survey: 243-Tire/64-Vehicle Summary

LOCATION STATS:

			P235/75R15	P255/70R16	P255/70R16	P235/75R15
Dealer	**City**	**Total**	**ST381J**	**ST358J**	**ST369J**	**Trade***
Click	Tucson	36	28		8	
Earnhardt	Tempe	32	20	4	8	
Friendly	Las Vegas	64	32		32	
Gaudin	Las Vegas	61	32		29	
Leadership	Dallas	15	14			1
Tuttle	Tucson	34	26		8	
unknown	unknown	1	1			
	Total	243	153	4	85	1

		P235/75R15	P255/70R16	P255/70R16	P235/75R15
City	**Total**	**ST381J**	**ST358J**	**ST369J**	**Trade***
Dallas	15	14			1
Las Vegas	125	64		61	
Tempe	32	20	4	8	
Tucson	70	54		16	
unknown	1	1			
Total	243	153	4	35	1

*Firestone Radial ATX aftermarket (trade) tire, P235/75R15

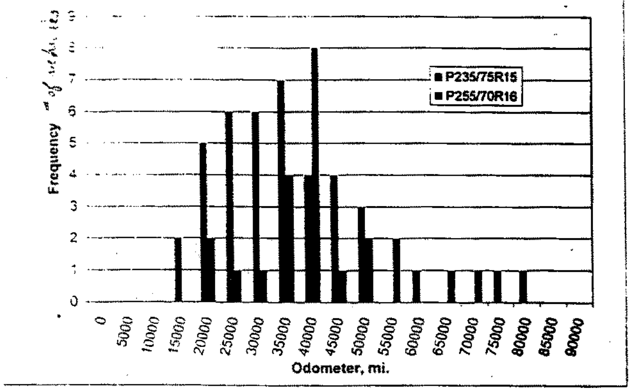
SW Tire Survey: 243-Tire/64-Vehicle Summary

VEHICLE MILEAGE STATS:

Vehicle:

Model Year	Tires	Vehicles	Vehicle Avg. Mi	
1995	4	1	72096	
1996	12	3	68144	
1997	84	22	36381	
1998	135	35	29776	
1999	[illegible]	[illegible]	16078	
Tag Error	[illegible]	[illegible]	n/a	(Excluded)
No VIN	4	[illegible]	47731	
No Tag	[illegible]	[illegible]	n/a	(Excluded)
Total	243	64		
			34649	**=avg of vehicles not excluded (63)**

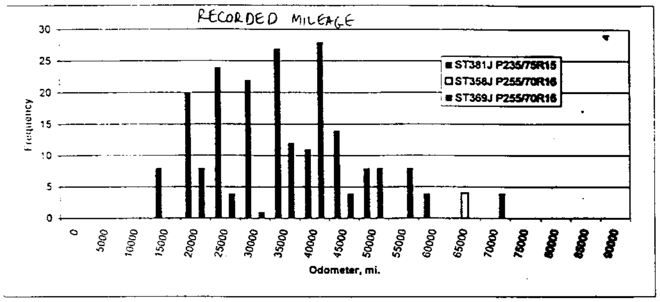
Vehicle Mileage Histogram:

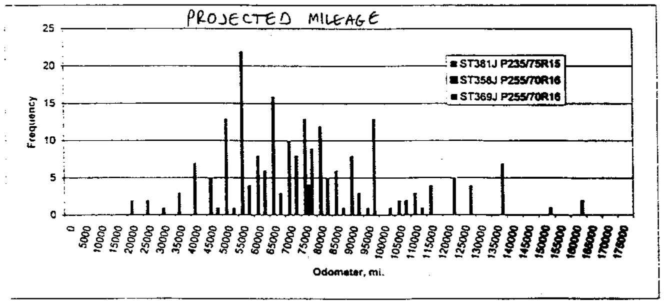


SW Tire Survey: 243-Tire/64-Vehicle Summary

TIRE MILEAGE STATS:

Tires:	All Tires	P235/75R15 ST381J	P255/70R16 ST358J	P255/70R16 ST369J	P235/75R15 Trade	
Reported	32995	29567	60062	37734	n/a	
ujwG Projected	72343	63009	77961	88781	n/a	
N	219	138	4	77	0	
Replaced	18	9	0	8	1	(Excluded)
Spares	3	3	0	0	0	(Excluded)
Tag Error	2	2	0	0	0	(Excluded)
No Tag	1	1	0	0	0	(Excluded)


RECORDED MILEAGE

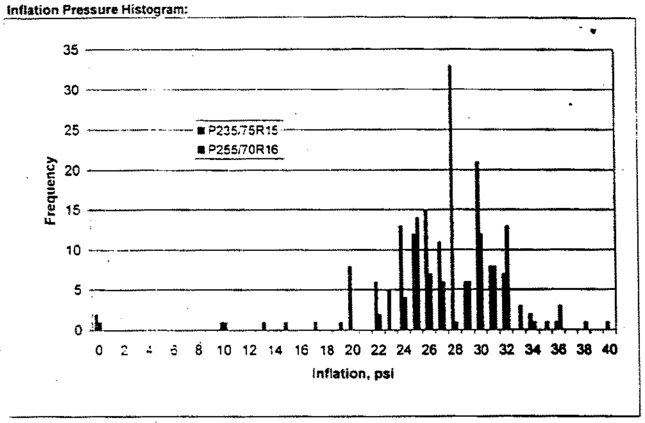

PROJECTED MILEAGE

SW Tire Survey: 243-Tire/64-Vehicle Summary

TIRE INFLATION STATS:

	All	P235/75R15 ST381J	P255/70R16 ST358J	P255/70R16 ST369J	P235/75R15 Trade	
Avg Psi	27.1	26.6	26	28.1	30	
N < 20 psi	9	4		5		
N	240	152	4	83	1	
No Tag	2	1		1		(Excluded)
Tag Error	1			1		(Excluded)

Inflation Pressure Histogram:



Notes:
- P235/75R15 vehicle inflation = 26/26 psi
- P255/70R16 vehicle inflation = 30/30 psi
- 48 (31%) P235/75R15 tires were < 26 psi
- 45 (51%) P255/70R16 tires were < 30 psi
- 9 tires were < 20 psi

SW Tire Survey: 243-Tire/64-Vehicle Summary

INSPECTION STATS:

		Plug	Patch	Patch & Plug	Object Thru	Object Not Thru	Off Road	Tread Cuts
P235/75R15	**ST381J**	6	23	6	6	8	4	8
P255/70R16	**ST358J**	0	0	0	2	1	0	0
P255/70R15	**ST369J**	1	19	8	6	2	12	5
P235/75R15	**Trade**	0	0	0	0	0	0	0
	Total No.	7	42	14	14	11		
	Tires	6	33	13	14	11	16	13
	% of Tires	2.5%	13.6%	5.3%	5.8%	4.5%	6.6%	5.3%

	Plug	Patch	Patch & Plug	Object Thru	Object Not Thru	Off Road	Tread Cuts	Tires
Dallas	13.0%	20.0%	13.0%	6.6%	6.6%	0.0%	0.0%	15
Las Vegas	2.4%	15.2%	5.6%	6.4%	4.0%	6.4%	6.4%	125
Tempe	0.0%	9.4%	3.1%	9.4%	9.4%	0.0%	0.0%	32
Tucson	1.4%	12.9%	4.3%	4.3%	4.3%	11.4%	7.1%	70

Plug = Improper, exterior application cord repair
Patch = Internal tire patch
Patch & Plug = Internal patch with integral or separate hole plug
Object Thru = Usually nail/screw/staple with penetration completely through tire
Object Not Thru = Usually nail/screw/staple with penetration not completely through tire
Off Road = Tires with some indication of unimproved road use, i.e. gravel
Tread Cuts = Tires with deep cuts in tread area

Notes:

- Some tires had more than one of, or a combination of, each item above
- 159 tires (65.4%) had none of the above
- 52 tires (21.4%) had repair(s)
- In most cases, objects through the tread (14 tires) were probably leaking
- In some cases, objects stuck in tread but not through, will eventually penetrate
- In 3 tires, repairs were made in the shoulder/buttress of the tire (improper area)
- In 1 tire, an internal patch was loose and probably permitting inflation loss
- 8 tires were worn out or almost worn out, some with shoulder wipe
- 1 tire was worn completely through the top steel belt in the shoulder

SW Tire Survey: 243-Tire/63-Vehicle Summary

LOCATION STATS:

Dealer	City	Total	P235/75R15 ST381J	P255/70R16 ST358J	P255/70R16 ST369J	Trade
Click	Tucson	36	28		8	
Earnhardt	Phoenix	32	20	4	8	
Friendly	Las Vegas	64	32		32	
Gaudin	Las Vegas	61	32		29	
Leadership	Dallas	15	14			1
Tuttle	Tucson	34	26		8	
unknown	unknown	1	1			
	Total	243	153	4	85	1

City	Total	P235/75R15 ST381J	P255/70R16 ST358J	P255/70R16 ST369J	Trade
Dallas	15	14			1
Las Vegas	125	64		61	
Phoenix	32	20	4	8	
Tucson	70	54		16	
unknown	1	1			
Total	243	153	4	85	1

Andy Van. U150 Chief Prog. Eng.
RVT
U152
Maybe Nick Kazan

} mtg to review SW survey results

SW Tire Survey: 243-Tire/63-Vehicle Summary

MILEAGE STATS:

Vehicle:

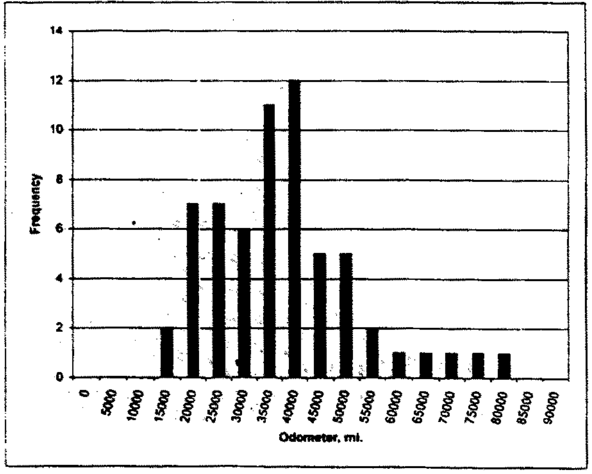
Model Year	Tires	Vehicles	Vehicle Avg. Mi
1995	4	1	72096
1996	9	3	68144
1997	86	22	36381
1998	135	35	29776
1999	4	1	16078
unknown	5	1	47731
Total	**243**	**63**	
			34649 **=avg all vehicles**

Tires:

	All Tires	P235/75R15 ST381J	P255/70R16 ST358J	P255/70R16 ST369J	Trade
Average	32967	29547	60062	37734	unk
Projected	72101	62693	77961	88781	unk
N	220	139	4	77	0
Excluded	23	14	0	8	1

Year/mileage of these vehicles

Vehicle Mileage Histogram:

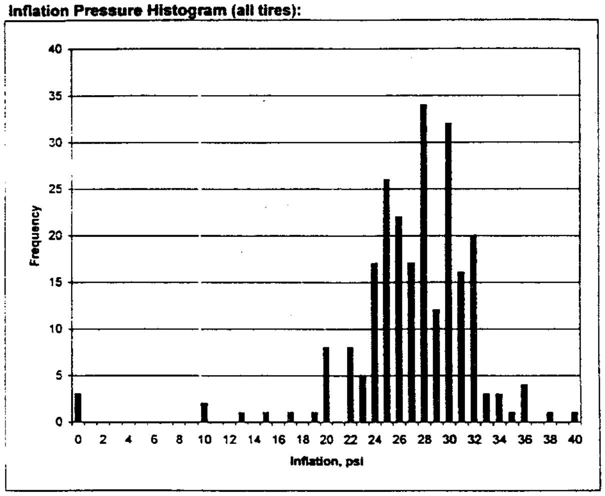


SW Tire Survey: 243-Tire/63-Vehicle Summary

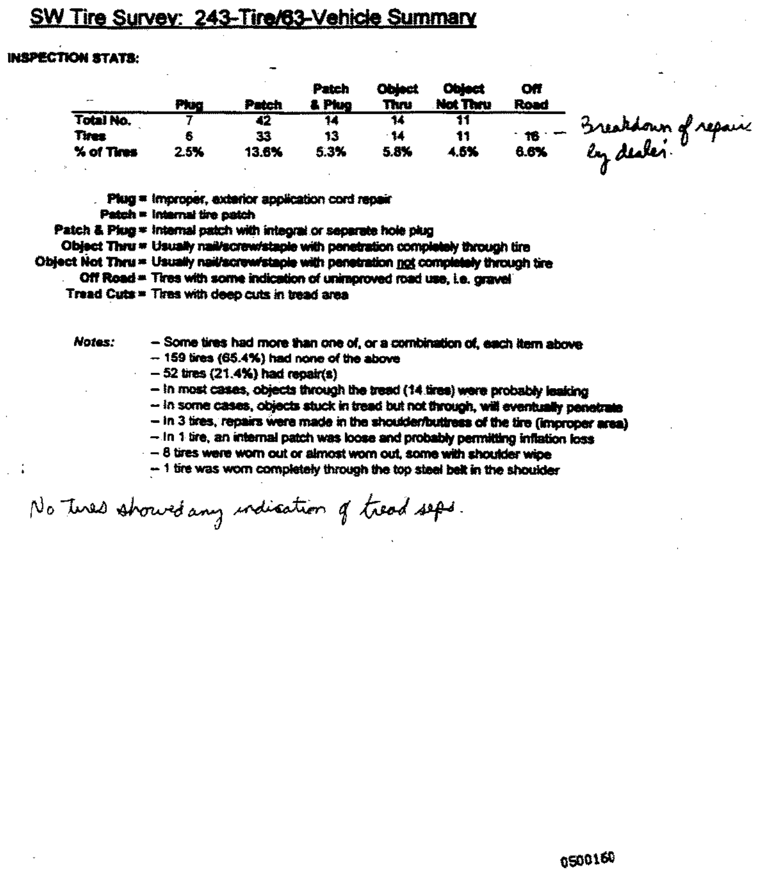
TIRE INFLATION STATS:

		P235/75R15	P255/70R16	P255/70R16	
	All	**ST381J**	**ST358J**	**ST369J**	**Trade**
Avg Psi	27.1	26.6	26	28.1	30
N	240	152	4	83	1
N < 20 psi	9	4		5	

Inflation Pressure Histogram (all tires):



Notes:
- ST381J vehicle inflation = 26/26 psi
- ST358J and ST369J vehicle inflation = 30/30 psi
- 48 (31%) ST381J tires were < 26 psi
- 45 (51%) ST358J and ST369J tires were < 30 psi
- 9 tires were < 20 psi



SW Tire Survey: 243-Tire/63-Vehicle Summary

INSPECTION STATS:

	Plug	Patch	Patch & Plug	Object Thru	Object Not Thru	Off Road
Total No.	7	42	14	14	11	
Tires	6	33	13	14	11	16
% of Tires	2.5%	13.6%	5.3%	5.8%	4.5%	6.6%

— Breakdown of repair by dealer.

Plug = Improper, exterior application cord repair
Patch = Internal tire patch
Patch & Plug = Internal patch with integral or separate hole plug
Object Thru = Usually nail/screw/staple with penetration completely through tire
Object Not Thru = Usually nail/screw/staple with penetration not completely through tire
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Notes:
- Some tires had more than one of, or a combination of, each item above
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- In 3 tires, repairs were made in the shoulder/buttress of the tire (improper area)
- In 1 tire, an internal patch was loose and probably permitting inflation loss
- 8 tires were worn out or almost worn out, some with shoulder wipe
- 1 tire was worn completely through the top steel belt in the shoulder

No tires showed any indication of tread seps.

Bridgestone/Firestone Statement Regarding Venezuela

August 28, 2000

The safety of our customer always come first. Therefore, we have been cooperating with the authorities in Venezuela to determine the facts surrounding any incidents involving our tires manufactured in Venezuela. The attached letter (translated from the Spanish) delivered this afternoon to the Venezuelan consumer protection agency, INDECU, is intended to clarify issues related to this matter.

We have been made aware of a situation involving an unintentional mistake in the markings on Wilderness AT tires in sizes P255 70R 16 and P235 75R 15 manufactured in Venezuela, which has been corrected. Our documentation shows that these mismarked tires were indeed the tires Ford requested, per their specification. The inadvertent marking errors had no bearing on tire quality, performance or safety of the product delivered to Ford. We have fully addressed the mismarking situation.

It is also important to note that the tires in Venezuela are manufactured with different components and to different specifications than the comparably sized U.S. manufactured tires. In addition, this mismarking situation is totally unrelated to the U.S. recall of certain P235 75R 15 tires. None of the mismarked tires were manufactured in the U.S., and none were exported to the U.S.

We are confident that a full review of this matter will demonstrate that we took appropriate action to address the situation. Our main concern is and has always been our customers' safety and satisfaction.

We have no plans at this time to conduct a voluntary recall in Venezuela, however, we will do everything that we can to satisfy our customers. We continue our review of our Venezuelan produced tires and will act swiftly if the information and data indicates the need to do so. Of course, we intend to cooperate fully with INDECU as the process moves forward.

###

(TRANSLATION FROM SPANISH)

August 28, 2000

Dear Sirs:

In furtherance of our letter of August 21st to you, we have been doing a complete analysis of all molds at our Venezuela factory. We confirm that the Venezuela-produced P255/70R 16 Wilderness AT (white wall) and the Venezuela-produced P235/75R 15 Wilderness AT (white and black wall) did have some inadvertent mismarkings. Production molds for these particular tires have already been corrected. Our documentation shows that these mismarked tires were indeed the tires Ford requested, but our markings were incorrect. In January of 1999, Ford of Venezuela requested that BFVZ submit proposed designs for a tire with a nylon cap ply, which was approved for use by Ford in June 1999 and went into production at BFVZ that same month. Please see the attached document.

In addition, during the course of our analysis we have also found some other molds at our Valencia facility with mismarkings and by today (Monday, August 28, 2000) we will have done a 100% verification of all molds in production. We will check all other non-production molds by Friday, September 1, 2000. Any molds found with mismarkings will be immediately corrected, or kept out of production.

As of today (Monday, August 28, 2000), no mismarked tires are being shipped to any of our customers or dealers. We have also requested our dealers to return to us all of their inventories of Venezuela-produced P255/70R 16 Wilderness AT (white wall) and Venezuela-produced P235/75R 15 Wilderness AT (white and black wall) inventory. This program began this past Thursday, August 24, 2000.

We will continue our full investigation of the mismarking problem and we expect to conclude this investigation by the end of this week as mentioned above. We will notify you promptly once we have the results.

Our goal continues to be to cooperate fully with your investigation.

Sincerely,

Bridgestone/Firestone Venezolana

(hand delivered August 28, 2000)

Explorer Tire DNP

The purpose of this note is to provide current status on reference subject.

Background.-

In July 1997 FoV representatives were called to a meeting in Caracas with a group of independent lawyers representing four (4) customers.

The objective of this meeting, as expressed by these lawyers, was to draw Ford attention to a situation related to their customers, but that they felt could be greater.

The situation described was that several Explorer (2dr and 4dr) would turn over unexpectedly as a consequence of a tire explosion.

Based on this information, known cases and several newspaper clippings (depicting similar situations). At least sixty (60) cases have been identified. Issue has a high fatality rate. FoV initiated a joint investigation with local and US based Firestone technical personnel.

The result of this investigation where inconclusive, although several findings were made:

- Venezuela drivers have very little conscious of tire maintenance. A significant number of vehicles evaluate had low tire pressure.
- No defects were seen on either mounted tires or samples of failed tires; 117 vehicles in three different regions were inspected.
- Ten (10) failed tires were inspected. Root cause of failure varied from tread loss, to tire puncture, to wheel deformation.
- Failed tire were either local or US import manufacture.
- High incidence vehicle roll over after a tire blow out or tread loss has not been detected for other vehicle brands;. Toyota, GM and Chrysler all have significant presence in this market segment.

Beginning first quarter of 1999, FoV notified this situation to Explorer PVT and the TVC.

TVC notified of a similar issue occurring in GCC, where WDMO was about to initiate a DNP consisting of a tire change to Goodyear brand.

FoV Actions.-

- To correct another claim related rear axle skate and handling at high speeds (140 km/h), FoV implemented in May 1999 a for Australia only shock absorber calibration.
- To align with GCC DNP and to improve Explorer market image, FoV introduced the same GCC Goodyear tire for all new Explorer, beginning July 1999.
- FoV has issued a TSB on rear axle skate/high speed handling. This TSB authorizes dealer to change complete set of shock absorbers to Australia only calibration on customer complaint.
- FoV may also authorize tire change (to Goodyear) to any customer with relevant claims on vehicle handling. No TSB has been issued.
- FoV has proposed a local DNP (only Venezuela) to handle this issue, consisting of a Tire and shock absorber change to all vehicles in the field produced since MY 1996 to Sept. 1999 when Goodyear tires where introduced locally for Explorer. Australian calibration shocks where incorporated in July 1999. Estimated cost US $ 8.528.576 (5.405.000 for tires and 3.123.576 for shocks).

~~Future actions.-~~

On hold for FRC (Field Review Committee) approval of local DNP.

Comments.-

Root cause of issue has yet to be established. TVC support will be needed if this objective is to be pursued.

Local DNP process approval by FAO has been lengthly.

Word of mouth and several newspaper articles, editorials and radio talk shows have been affecting Explorer image.

The DNP process needs to be accelerated so that issue can be contained.

Al Jazirah Vehicles Location
Jeddah
Howard Riley Contacts
Service Manager

		9 Jun DATE	DOT	Tread Depth	P	Spec	Chp	R	Comments
KM	VIN	Tire Code RF	VN245	11 11.10	30	ST358J	C1	N	
10K	[redacted]	Tire Code LF	W2108	13.13.13	31	ST369J	C0	N	Tire appears new
		Tire Code RR	VN235	10 5,10 5,10	31	ST358J	C1	N	Light side wall cut and deep cut in tread area
		Tire Code LR	VN245	10,10,10	33	ST358J	C2	N	H Riley driving unit
									Bruce took photos, needs new RR tire
KM	VIN	Tire Code RF	W2188	12,13,11 5	37	ST369J	C2	N	Do not appear original, photo of cuts 7/32 deep taken
58K	[redacted]	Tire Code LF	W2457	11,13,12	37	ST369J	C1	N	
		Tire Code RR	VN228	12,11,11	38	ST369J	C1	N	
		Tire Code LR	VN347	11,10,11	38	ST369J	C2	N	Nail found in tire it was pulled and was not leaking
KM	VIN	Tire Code RF	W2477	11,10,10	38	ST369J	C0	Y	Cord plug in tire
25K	[redacted]	Tire Code LF	W2477	10,11,11 5	29	ST369J	C1	N	
		Tire Code RR	W2477	10,10,10	28	ST369J	C1	Y	Large cord plug
		Tire Code LR	W2477	10,10,11	28	ST369J	C0	N	
									Looks like city driving
KM	VIN	Tire Code RF			28				
46K	[redacted]	Tire Code LF			29				Goodyear Wrangler RT/S
	New Goodyear	Tire Code RR			28				P255/70R16 109S
	tires on vehicle	Tire Code LR			28				Only checked infl pressure
									Also new shocks on vehicle.
KM	VIN	Tire Code RF	VN368	14,13,12	26	ST369J	C0	N	
118K	[redacted]	Tire Code LF	VN398	13,12,13	26	ST369J	C0	N	
		Tire Code RR	VN106	10,10,9	28	ST369J	C1	Y	Cord plug in tire
		Tire Code LR	VN508	13 5,13,13	38	DE504J	C0	N	Special Service tire -DE504J
KM	VIN	Tire Code RF	VN358	12,12,11 5	39	ST369J		N	
107K	[redacted]	Tire Code LF	VN358	12,11 5,11 5	40	ST369J		N	
		Tire Code RR	VN357	10,8,8 5	40	ST369J		N	
		Tire Code LR	VN377	9,8,8	38	ST369J		N	
									Very little off road driving, new front tires on unit
KM	VIN	Tire Code RF	W2086	10 5,10,10	35	ST369J	C1	N	
41K	[redacted]	Tire Code LF	W2096	9,8 5,8 5	36	ST369J	C1	N	
		Tire Code RR	W2096	10,9,9	35	ST369J	C1	N	
		Tire Code LR	W2096	10,9,9	28	ST369J	C1	N	Found cut to steel w/ slow leak tire has evidence of tread separation
									This tire was cut open and photos taken, tire sample is with Ritz at HHA
KM	VIN	Tire Code RF	VN116	9,8,7 5	34	ST369J	C1	N	
16K	[redacted]	Tire Code LF	VN116	9,8,8	34	ST369J	C1	Y	Small nail in tire & one cord repair
		Tire Code RR	VN116	9,8 5,8	33	ST369J	C1	Y	Cord repair
		Tire Code LR	VN116	8,8,8	32	ST369J	C1	N	Side wall has slice in it

67 vehicles 268 tires on vehicles inspected 5 tires showing [illegible] to loose tread

DOT Outside / Middle / Inside

Chip codes C0, C1, C2, C

REDACTED

KM	VIN	Tire Code RF	VN108	12,11,12	23	ST369J	C0	N	
9K	[redacted]	Tire Code LF	VN108	12,11 5,12	28	ST369J	C0	N	
		Tire Code RR	VN108	12,11 5,12	26	ST369J	C0	N	
		Tire Code LR	VN108	12,11 5,12	14	ST369J	C0	N	Tire has nail in it and is leaking
KM	VIN	Tire Code RF	VN347	9 5,8,6	38	ST369J	C1	N	
94K	[redacted]	Tire Code LF	W2097	8,5,5	39	ST369J	C1	Y	Cord repair
		Tire Code RR	GY	Wrangler	40	RT/S			P255/70R16 109S
		Tire Code LR	GY	Wrangler	38	RT/S			P255/70R16 109S
KM	VIN	Tire Code RF	VN346	9,8,8	26	ST369J	C1	N	
27K	Vehicle on lift with door	Tire Code LF	VN346	10,10,10	25	ST369J	C1	N	
	locked, and transmission	Tire Code RR	VN346	8 5,8 5,8 5	33	ST369J	C0	Y	Cord repair
	jack under vehicle	Tire Code LR	VN346	9,8 5,8 5	29	ST369J	C2	Y	Cord repair and large cut on lug

REDACTED

DOT Outside / Middle / Inside

Chip codes C0 C1 C2 C3

Haji Husein Alireza — Location

Jeddah

Riaz Pisano Service Mgr — Contacts

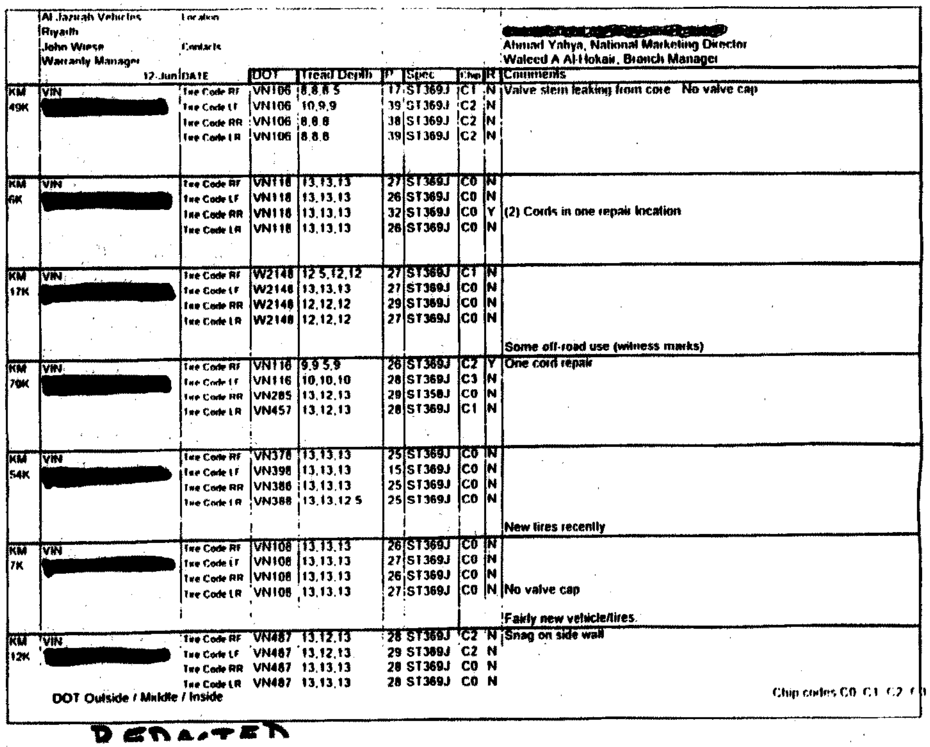
Danny Hinchin Ser. Dir.

10 Jun

Ali Alireza

KM	VIN		DOT	Tread Depth	P	Spec	Chp	R	Comments
KM	VIN	Tire Code RF	W2017	10,10,8	36	ST369J	C3	N	
27K	[redacted]	Tire Code LF	W2017	11,10,11	35	ST369J	C0	N	
		Tire Code RR	W2017	10,9,7	35	ST369J	C1	N	Heavy inner tire wear
		Tire Code LR	W2017	11,10,12	35	ST369J	C1	N	
KM	VIN	Tire Code RF	VN346	10,9,8	38	ST369J	C3	N	Deep cut in tread
60K	[redacted]	Tire Code LF	VN029	13,13,13	33	DE504J	C0	N	New Special Service tire
		Tire Code RR	VN346	10,9,8	37	ST369J	C2	N	Some impact damage
		Tire Code LR	VN346	10,10,7.5	37	ST369J	C3	N	
KM	VIN	Tire Code RF	TOYO	TRANPATH	30				
73K	[redacted]	Tire Code LF	TOYO	P255/70R16	27				
		Tire Code RR	TOYO	109S	30				
		Tire Code LR	VN368	12,11,12	31	ST369J	C0	N	Don't know why LR was changed from TOYO?
KM	VIN	Tire Code RF	W2397	11,12,10	34	ST369J	C0	N	
32K	[redacted]	Tire Code LF	W2397	11,11,10	33	ST369J	C0	N	
		Tire Code RR	W2397	12,10,11	33	ST369J	C0	N	
		Tire Code LR	W2397	12,10,11	33	ST369J	C0	N	Vehicle just serviced & technician did not notice nail & leak in tire
KM	VIN	Tire Code RF	VN368	12,13,13	34	ST369J	C0	N	
27K	[redacted]	Tire Code LF	VN368	13,13,13	35	ST369J	C0	N	
		Tire Code RR	VN368	13,13,13	35	ST369J	C0	N	This is a new set of replacement tires
		Tire Code LR	VN368	12,13,12	31	ST369J	C1	Y	Tire has plug in the side wall and is bulging in repair area*******
KM	VIN	Tire Code RF	VN326	8,7,5	20	ST369J	C1	N	Nail in tire that is leaking
46K	[redacted]	Tire Code LF	VN326	9,9,6.5	21	ST369J	C2	Y	Cord plug and inside edge is down to steel belts
		Tire Code RR	VN326	10,9,9	20	ST369J	C1	Y	Cord plug
		Tire Code LR	VN326	8,7,8	23	ST369J	C1	Y	Cord plug in tread area and one in shoulder area
									Vehicle needs 4 tires good example of a problem vehicle********
KM	VIN	Tire Code RF	VN326	7,7,5	28	ST369J	C1	Y	Cord plug outside tread area
38K	[redacted]	Tire Code LF	W2107	10,8,6	26	ST369J	C2	N	
		Tire Code RR	VN136	7,6,5.4	25	ST369J	C2	N	Tire worn out
		Tire Code LR	VN326	6,5,6,5	33	ST369J	C3	Y	Cord plug & dangerous cut in tread area

REDACTED



Al Jazirah Vehicles
Riyadh
John Wiese
Warranty Manager

Location

Contacts

[redacted]
Ahmad Yahya, National Marketing Director
Waleed A Al-Hokair, Branch Manager

KM	VIN	12-Jun DATE	DOT	Tread Depth	P	Spec	Chp	R	Comments
KM	VIN	Tire Code RF	VN106	8,8,8.5	17	ST369J	C1	N	Valve stem leaking from core No valve cap
49K	[redacted]	Tire Code LF	VN106	10,9,9	39	ST369J	C2	N	
		Tire Code RR	VN106	8,8,8	38	ST369J	C2	N	
		Tire Code LR	VN106	8,8,8	39	ST369J	C2	N	
KM	VIN	Tire Code RF	VN118	13,13,13	27	ST369J	C0	N	
6K	[redacted]	Tire Code LF	VN118	13,13,13	26	ST369J	C0	N	
		Tire Code RR	VN118	13,13,13	32	ST369J	C0	Y	(2) Cords in one repair location
		Tire Code LR	VN118	13,13,13	26	ST369J	C0	N	
KM	VIN	Tire Code RF	W2148	12.5,12,12	27	ST369J	C1	N	
17K	[redacted]	Tire Code LF	W2148	13,13,13	27	ST369J	C0	N	
		Tire Code RR	W2148	12,12,12	29	ST369J	C0	N	
		Tire Code LR	W2148	12,12,12	27	ST369J	C0	N	
									Some off-road use (witness marks)
KM	VIN	Tire Code RF	VN116	9,9.5,9	26	ST369J	C2	Y	One cord repair
70K	[redacted]	Tire Code LF	VN116	10,10,10	28	ST369J	C3	N	
		Tire Code RR	VN285	13,12,13	29	ST358J	C0	N	
		Tire Code LR	VN457	13,12,13	28	ST369J	C1	N	
KM	VIN	Tire Code RF	VN378	13,13,13	25	ST369J	C0	N	
54K	[redacted]	Tire Code LF	VN398	13,13,13	15	ST369J	C0	N	
		Tire Code RR	VN386	13,13,13	25	ST369J	C0	N	
		Tire Code LR	VN388	13,13,12.5	25	ST369J	C0	N	
									New tires recently
KM	VIN	Tire Code RF	VN108	13,13,13	26	ST369J	C0	N	
7K	[redacted]	Tire Code LF	VN108	13,13,13	27	ST369J	C0	N	
		Tire Code RR	VN108	13,13,13	26	ST369J	C0	N	
		Tire Code LR	VN108	13,13,13	27	ST369J	C0	N	No valve cap
									Fairly new vehicle/tires.
KM	VIN	Tire Code RF	VN487	13,12,13	28	ST369J	C2	N	Snag on side wall
12K	[redacted]	Tire Code LF	VN487	13,12,13	29	ST369J	C2	N	
		Tire Code RR	VN487	13,13,13	28	ST369J	C0	N	
		Tire Code LR	VN487	13,13,13	28	ST369J	C0	N	

DOT Outside / Middle / Inside

Chip codes C0 C1 C2

REDACTED

KM	VIN	Tire Code RF	VN138	13,13,13	28	ST369J	C0	N	
14K	[redacted]	Tire Code LF	VN138	13,13,13	28	ST369J	C0	N	
		Tire Code RR	VN138	13,13,13	28	ST369J	C0	N	
		Tire Code LR	VN138	13,13,13	28	ST369J	C0	N	
KM	VIN	Tire Code RF	W2467	13,13,13	33	ST369J	C0	N	
123K	[redacted]	Tire Code LF	W2447	11.5,11.5,11	32	ST369J	C2	N	
		Tire Code RR	VN457	13,13,13	33	ST369J	C0	N	
		Tire Code LR	VN467	12,13,12	34	ST369J	C0	N	
									Some off-road use (witness marks)
KM	VIN	Tire Code RF	W2107	13,12.5,12	29	ST369J	C0	N	
8K	[redacted]	Tire Code LF	W2107	13,13,13	30	ST369J	C0	N	
		Tire Code RR	W2107	12,12,12	30	ST369J	C0	N	
		Tire Code LR	W2107	13,12,12	32	ST369J	C0	N	
KM	VIN	Tire Code RF	VN155	10,11,10	26	ST358J	C2	N	
67K	[redacted]	Tire Code LF	VN265	10,10,10	45	ST358J	C2	N	
		Tire Code RR	VN265	10,11,10	35	ST358J	C0	N	
		Tire Code LR	VN265	11,11,11	38	ST358J	C0	N	Nail removed from tread lug, no leak.
KM	VIN	Tire Code RF	VN457	11,12,12	29	ST369J	C0	N	
??	[redacted]	Tire Code LF	VN367	10,10,10	32	ST369J	C2	N	
		Tire Code RR	VN367	10,10,10	39	ST369J	C1	N	
		Tire Code LR	VN457	13,12,12	30	ST369J	C0	N	

REDACTED

DOT Outside / Middle / Inside

Chip codes C0 C1 C2 C3

Hajj Husein Alireza
Riyadh
Jeff Simpson
Service Manager

Location

Contacts

Abdullah Al Rashed, Credit Manager, "Acting General Manager"

	13 Jun	DATE	DOT	Tread Depth	P	Spec	Clip	R	Comments
KM 14K	VIN [redacted]	Tire Code RF	VN326	11 5,12,11 5	26		C1	N	
		Tire Code LF	VN316	12 11,11 5	35		C0	N	Missing valve cap
		Tire Code RR	VN316	11 5,11 5,11	38		C1	N	
		Tire Code LR	VN326	11 5,11 5,12	37		C1	Y	CUT ON SIDE WALL Unit was in a prior unrelated accident, has a bent frame
KM 20K	VIN [redacted]	Tire Code RF	W2407	12,12,12	28		C0	N	
		Tire Code LF	W2407	13,12,12	29		C0	N	
		Tire Code RR	W2407	12,12,12	28		C0	N	
		Tire Code LR	W2407	12,12,12	29		C0	N	
KM 38K	VIN [redacted]	Tire Code RF	W2396	12,12,12	40		C1	N	
		Tire Code LF	W2396	11,11,12	35		C1	N	Has nail in tire with slight leak
		Tire Code RR	W2396	12,12,12	37		C1	Y	Missing valve cap
		Tire Code LR	W2396	12,12,12	37		C0	N	Missing valve cap
KM 59K	VIN [redacted]	Tire Code RF	VN326	11,11,10 5	29		C1	N	
		Tire Code LF	VN326	11 5,12,11 5	28		C1	Y	Repair is in shoulder area
		Tire Code RR	VN326	11,11,11	30		C1	N	Thorn in side wall
		Tire Code LR	VN326	11,11,11	28		C1	N	
KM 68K	VIN [redacted]	Tire Code RF	VN488	13,13,13	32		C0	N	Special Service tire
		Tire Code LF	VN518	13,13,13	33		C0	N	Special Service tire
		Tire Code RR	VN326	9,8 5,7	36		C1	N	
		Tire Code LR	VN326	10,9,7	35		C1	N	
KM 4K	VIN [redacted]	Tire Code RF	W2477	12,13,13	26		C0	N	
		Tire Code LF	W2487	12,13,13	27		C0	N	
		Tire Code RR	W2477	12 5,12 5,12	28		C0	N	
		Tire Code LR	W2477	11 5,11 5,11	30		C0	N	
KM 20K	VIN [redacted]	Tire Code RF	W2128	12,13,12	30		C0	N	
		Tire Code LF	W2128	12,12,12	30		C0	N	
		Tire Code RR	W2128	12,12,12	30		C1	N	Has nail with slight leak
		Tire Code LR	W2128	12,12,12	30		C0	N	

REDACTED

DOT Outside / Middle / Inside

Clip codes C0 C1 C2 C3

	Al Jazirah Al Khobar	Location							Shk Abdullah Al Kraddees - President Shk Abdullatif A Al-Mubarak, Regional Manager
	Paul Wright Technical Branch Mgr	Contacts							
		DATE	DOT	Tread Depth	P	Spec	Chp	R	Comments
KM	VIN	Tire Code RF	VN116	8 5 8 5,7	35	ST369J	C2	N	Starting to seperate
72K	[redacted]	Tire Code LF	VN116	9,9 9	35	ST369J	C2	N	Starting to seperate
		Tire Code RR	VN116	9 9 8	35	ST369J	C2	N	One nail, not leaking
		Tire Code LR	VN116	7,9,8	32	ST369J	C1	N	
KM	VIN	Tire Code RF	VN235	9,11,11	35	ST358J	C1	Y	Two separate rope repairs and sholder cracking
48K	[redacted]	Tire Code LF	VN235	11,11,10	33	ST358J	C1	N	Sholder Cracking
		Tire Code RR	VN285	11,12,11 5	30	ST358J	C2	N	Has nail and is leaking
		Tire Code LR	VN285	11,12,11	32	ST358J	C2	N	
KM	VIN	Tire Code RF			34	DE504J			All tires new Special Service
49K	[redacted]	Tire Code LF			35	DE504J			
		Tire Code RR			34	DE504J			
		Tire Code LR			34	DE504J			
KM	VIN	Tire Code RF	VN498	13,13 5,13	30	ST369J	C0	N	
60K	[redacted]	Tire Code LF	VN488	13,13,13	31	ST369J	C0	N	
		Tire Code RR	VN228	12,12,12	12	ST369J	C2	N	One nail that's leaking
		Tire Code LR	VN238	13,12,11 5	29	ST369J	C0	N	

REDACTED

DOT Outside / Middle / Inside

Chip codes C0 C1 C2 C3

	HHA Al Khobar	Location								Shk Hasan A Abdulhasan, Director / Owner
	Steve Freeman Service Manager	Contacts								Gary Wager, General Manager
	15-Jun	DATE	DOT	Tread Depth	P	Spec	Chip	Crk	R	Comments
KM 111K	VIN [redacted]	Tire Code RF	VN348	13,13,13	23	ST369J	C0		N	
		Tire Code LF	VN387	12,12,11	23	ST369J	C1		N	
		Tire Code RR	VN338	12,12,12	23	ST369J	C0		N	
		Tire Code LR	W2167	12,11 5,10	23	ST369J	C0		N	
KM 65K	VIN [redacted]	Tire Code RF	VN316	11 5,10 5,9	36	ST369J	C1		N	
		Tire Code LF	VN326	11,11,10 5	38	ST369J	C1		N	
		Tire Code RR	VN326	10 5,10 5,10	34	ST369J	C2		Y	1 nail in tire with slight leak, one repair, one deep cut to steel cord
		Tire Code LR	VN326	11,11,10	40	ST369J	C1		Y	One Cord Repair and one nail that's not leaking
KM 55K	VIN [redacted]	Tire Code RF	W2506	10,10,10	30	ST369J	C1	2	N	
		Tire Code LF	W2506	10,10,9	30	ST369J	C0	1	N	
		Tire Code RR	W2506	9,8,8	28	ST369J	C2	2	N	
		Tire Code LR	W2506	9,9,9	31	ST369J	C0	2	N	
KM 35K	VIN [redacted]	Tire Code RF	W2476	10,10,10	30	ST369J	C2	2	N	
		Tire Code LF	W2067	12,11,10	33	ST369J	C1	3	N	large eight inch area of tread separation, recommended tires be replaced
		Tire Code RR	W2057	11,10,12	30	ST369J	C0	0	N	
		Tire Code LR	VN347	12,12,12	32	ST369J	C0	0	N	
KM 10K	VIN [redacted]	Tire Code RF	W2217	12 5,12,12 5	27	ST369J	C0	0	N	One nail in tread, slowly leaking
		Tire Code LF	W2217	13,12,13	29	ST369J	C0	0	N	
		Tire Code RR	W2217	12,12,13	27	ST369J	C1	2	N	Cut on side wall
		Tire Code LR	W2217	13,12 5,12 5	28	ST369J	C0	0	N	
KM 28K	VIN [redacted]	Tire Code RF	W2456	8,8,8	31	ST369J	C1	1	N	
		Tire Code LF	W2456	8,7,8	31	ST369J	C0	1	N	
		Tire Code RR	W2456	8,8,8	31	ST369J	C2	2	N	
		Tire Code LR	W2456	8,7,7	31	ST369J	C1	2	N	
KM 28K	VIN [redacted]	Tire Code RF	W2507	12,11,11	34	ST369J	C0	0	N	
		Tire Code LF	W2507	12,12,13	28	ST369J	C0	0	N	
		Tire Code RR	W2507	11,11,11 5	28	ST369J	C0	0	N	
		Tire Code LR	W2507	12,12,12	28	ST369J	C0	0	N	

REDACTED

DOT Outside / Middle / Inside

Chip codes C0 C1 C2 C3

Almana Motors Co
Doha Qatar
Boghos K. Kalachian
Service Manager

Location

Contacts

Bader Almana Managing Director

		DATE	DOT	Tread Depth	P	Spec	Chip	Ct	R	Comments
KM	VIN	Tire Code RF	VN215	7,7,4	23	ST358J	C3	1	N	Severe side wall scuffing and ROWL tears
84K	[redacted]	Tire Code LF	VN215	7,7,5	27	ST358J	C3	1	N	
		Tire Code RR	W2345	12,11,12	36	SI878J	C0	0	N	Firestone FR480 spare P225/70R15
		Tire Code LR	VN165	8,8,8	25	ST358J	C3	0	N	Sidewall cut, 3/32 deep
KM	VIN	Tire Code RF	VN208	12.5,12,10	31	ST369J	C0	0	N	
60K	[redacted]	Tire Code LF	VN218	12,11,11	32	ST369J	C0	0	Y	One repair
		Tire Code RR	VN166	8,7,8	30	ST369J	C3	0	N	Severe tread cuts
		Tire Code LR	VN276	8,8,6	34	ST369J	C3	2	N	
KM	VIN	Tire Code RF	W2107	12,12,12	25	ST369J	C0		N	One deep tread cut
14K	[redacted]	Tire Code LF	W2107	12,12.5,13	26	ST369J	C0		N	
		Tire Code RR	W2416	12,12,12	25	ST369J	C0		N	
		Tire Code LR	W2107	12,12,12	22	ST369J	C0		N	One nail in tread, leaking
KM	VIN	Tire Code RF			30					
180K	[redacted]	Tire Code LF			29					All four tires: 245/70R16 107H General XP2000
		Tire Code RR			29					
		Tire Code LR			32					
KM	VIN	Tire Code RF			26					
112K	[redacted]	Tire Code LF			27					All four tires P255/70R16 109S Goodyear Wrangler RT/S
		Tire Code RR			27					
		Tire Code LR			28					
KM	VIN	Tire Code RF			24					This RF tire well worn to cord.
125K	[redacted]	Tire Code LF			24					All four tires
		Tire Code RR			15					LT245/75R16 120/116R LR-E General Ameri*550 AS
		Tire Code LR			25					

REDACTED

DOT Outside / Middle / Inside

Chip codes C0 C1 C2 C3

ACM Oman Location Ruwi Oman
Ravindran Service Mgr
Ashok Pandey Gen. Mgr Contacts SH CR=Sholder Cracking

	17 Jun	DATE	DOT	Tread Depth	P	Spec	Chip	R	Comments
KM	VIN	Tire Code RF	VN368	11.11.11	22		C0	N	TREAD CUTS
14 5	[redacted]	Tire Code LF	VN358	12.12.12	25		C0	N	CRACKING -2
		Tire Code RR	VN368	12.12.11	24		C1	N	
		Tire Code LR	VN368	12.11.12	25		C0	N	2 TREAD CUTS
KM	VIN	Tire Code RF		13.12.12	30				ALL TIRES CFAO89 BRIDGESTONE 265/70 R16
79K	[redacted]	Tire Code LF		11.12.13	29				
		Tire Code RR		11.11.11	29				
		Tire Code LR		11.12.13	29				
KM	VIN	Tire Code RF	VN386	12.12.12	32		C2	N	Owner stated he has put 16 tires in total on vehicle all Wilderness AT spec
250K	[redacted]	Tire Code LF	VN358	12.12.12	32		C0	N	Customer said he has had both rear tires blow out two times and tread cam
		Tire Code RR	W2497	11.10 5.10	31		C2	N	off and has damaged rear tail gate Photos taken Good unit to put Special
		Tire Code LR	W2497	10 5.10 5.10	32		C2	N	Service tires on ASAP Drives both on and off road
KM	VIN	Tire Code RF	VN498	13.13.13	25				
1K	[redacted]	Tire Code LF	VN488	13.13.13	26				New Truck
		Tire Code RR	VN488	13.13.13	26				
		Tire Code LR	VN458	13.13.13	26				
KM	VIN	Tire Code RF			29				
38K	[redacted]	Tire Code LF			28				Pirelli Scorpion A/T
		Tire Code RR			28				LT245/75 R16 120/116Q LRE
		Tire Code LR			30				
KM	VIN	Tire Code RF	W2347	13.12.10	27		C2	N	Crack 1, missing valve cap, upper side wall cut
70K	[redacted]	Tire Code LF	W2347	11.11.10	30		C1	N	Crack 1, missing valve cap
		Tire Code RR	W2347	10.10.10	27		C2	N	Crack 1
		Tire Code LR	W2347	11.11.11	26		C2	Y	Crack 1, rubber plug used but is outside of the repair area
KM	VIN	Tire Code RF			27				
150K	[redacted]	Tire Code LF			26				Goodyear Wrangler HT
		Tire Code RR			27				LT 245 / 75R16 120 / 116R LRE
		Tire Code LR			28				
KM	VIN	Tire Code RF	W2485	10.10.10	27		C3	N	SH CR 1
25K	[redacted]	Tire Code LF	W2485	10.10.10	28		C3	N	SH CR1
		Tire Code RR	W2485	10.10.10	27		C3	N	SH CR 2
		Tire Code LR	W2485		27	ST369J	C3	N	SH CR 2, Cut side wall

DOT Outside / Middle / Inside

Chip codes C0 C1 C2 C3

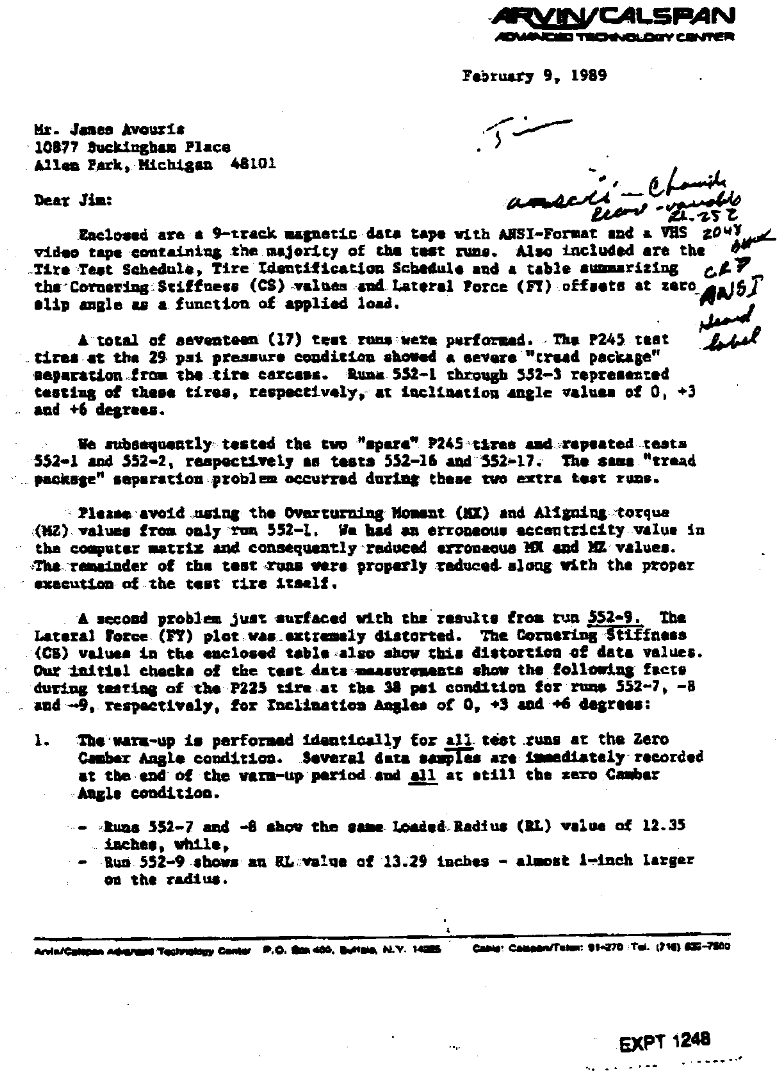
REDACTED

KM	VIN	Tire Code RF	W2037	12,11,11	27		C1	N	SH CR 0
16K	[redacted]	Tire Code LF	W2037	12 12 12	27		C1	N	SH CR 1
		Tire Code RR	W2087	12,13,12	27		C1	N	SH CR 0
		Tire Code LR	W2087	12,12 12	28		C2	N	SH CR 0
KM	VIN	Tire Code RF	W2047	12,12,12	28		C1	N	
70K	[redacted]	Tire Code LF	W2047	11 5,12,12 5	27		C0	N	
		Tire Code RR	W2047	12,12,12	26		C0	N	
		Tire Code LR	W2047	13,12,12	27		C0	N	
KM	VIN	Tire Code RF	W2406	11,10,10	25		C1	N	SH CR O, No valve cap
42K	[redacted]	Tire Code LF	W2168	13,12 5,11 5	28		C0	N	SH CR O
		Tire Code RR	W2416	10,10,9	22		C1	N	SH CR O
		Tire Code LR	W2416	11,10,10	23		C0	N	SH CR O
KM	VIN	Tire Code RF	W2407	12,11,11	22		C0	N	SH CR O, No valve cap
30K	[redacted]	Tire Code LF	W2407	11,11,12	18		C0	N	SH CR 0
		Tire Code RR	W2407	11,11,11	21		C0	N	SH CR O, No valve cap
		Tire Code LR	W2407	11,11,11	21		C0	N	SH CR O, No valve cap
KM	VIN	Tire Code RF	W2476	10,9,10	21		C3	N	SH CR 1
55K	[redacted]	Tire Code LF	W2117	9,8,8	20		C3	Y	
		Tire Code RR		5,5,6	23		C3	N	Deep crack, Bstone, desert dueler, EJ124
		Tire Code LR	W2416	10,8 5,8	25		C2	Y	Side wall plug, tire is starting to separate, Service Manager advised
	NEEDS NEW TIRES								All tires need to be changed
	Loose Tires W2486, 46KM 1 Cord Repair			7,10,9					Signs of separation starting 70648 Reg No
	VN486 70989 Reg No								Tread BLB Customer had BLB week earlier on other tire

REDACTED

DOT Outside / Middle / Inside

Chip codes C0 C1 C2 C3



ARVIN/CALSPAN
ADVANCED TECHNOLOGY CENTER

February 9, 1989

Mr. James Avouris
10877 Buckingham Place
Allen Park, Michigan 48101

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Dear Jim:

Enclosed are a 9-track magnetic data tape with ANSI-Format and a VHS video tape containing the majority of the test runs. Also included are the Tire Test Schedule, Tire Identification Schedule and a table summarizing the Cornering Stiffness (CS) values and Lateral Force (FY) offsets at zero slip angle as a function of applied load.

A total of seventeen (17) test runs were performed. The P245 test tires at the 29 psi pressure condition showed a severe "tread package" separation from the tire carcass. Runs 552-1 through 552-3 represented testing of these tires, respectively, at inclination angle values of 0, +3 and +6 degrees.

We subsequently tested the two "spare" P245 tires and repeated tests 552-1 and 552-2, respectively as tests 552-16 and 552-17. The same "tread package" separation problem occurred during these two extra test runs.

Please avoid using the Overturning Moment (MX) and Aligning torque (MZ) values from only run 552-1. We had an erroneous eccentricity value in the computer matrix and consequently reduced erroneous MX and MZ values. The remainder of the test runs were properly reduced along with the proper execution of the test tire itself.

A second problem just surfaced with the results from run 552-9. The Lateral Force (FY) plot was extremely distorted. The Cornering Stiffness (CS) values in the enclosed table also show this distortion of data values. Our initial checks of the test data measurements show the following facts during testing of the P225 tire at the 38 psi condition for runs 552-7, -8 and -9, respectively, for Inclination Angles of 0, +3 and +6 degrees:

1. The warm-up is performed identically for all test runs at the Zero Camber Angle condition. Several data samples are immediately recorded at the end of the warm-up period and all at still the zero Camber Angle condition.

    - Runs 552-7 and -8 show the same Loaded Radius (RL) value of 12.35 inches, while,
    - Run 552-9 shows an RL value of 13.29 inches - almost 1-inch larger on the radius.

2. The Angular Wheel Speed (N) value correlates to this larger tire by showing a smaller value for wheel revolutions per minute (RPM) at a constant velocity of 55 mph.

   - Runs 552-7 and -8 show 698 RPM, while,
   - Run 552-9 shows 647 RPM.

3. The Tread Surface Temperature (TST) during the remainder of the test, shows that run 552-9 is running about 30°C hotter than the other runs.

4. The Longitudinal Force (FX) measurements during the remainder of the test, shows that run 552-9 ran with a 2 to 3 times greater drag force.

At this time, we can only conclude that the data measurements are indeed real and that we had no instrumentation problems. We will continue to analyze the data results from the test program.

The final-interim report for this test phase is in progress and should be completed early next week.

Please feel free to call me if you have any questions or if you need additional information.

Sincerely yours,

G. Tapia

George A. Tapia
Section Head
Tire Research Facility

lms

encs.

EXPT 1249

TEST SCHEDULE

FORD

RUN	TIRE	ROAD CONDITION	P * psi	V mph	SLIP RATIO	SA deg	IA deg	LOAD lb	COMMENTS /RUN TIME
552-1	552-1	Flat-Dry	29 r	55	Free Rolling	S1	0	L1	C1,C9,C4
552-2	552-2	Flat-Dry	29 r	55	Free Rolling	S1	3	L1	C1,C5
552-3	552-3	Flat-Dry	29 r	55	Free Rolling	S1	6	L1	C1
552-4	552-4	Flat-Dry	38 r	55	Free Rolling	S1	0	L1	
552-5	552-5	Flat-Dry	38 r	55	Free Rolling	S1	3	L1	
552-6	552-6	Flat-Dry	38 r	55	Free Rolling	S1	6	L1	
552-7	552-9	Flat-Dry	38 r	55	Free Rolling	S1	0	L1	
552-8	552-10	Flat-Dry	38 r	55	Free Rolling	S1	3	L1	
552-9	552-11	Flat-Dry	38 r	55	Free Rolling	S1	6	L1	
552-10	552-13	Flat-Dry	38 r	55	Free Rolling	S1	0	L1	
552-11	552-14	Flat-Dry	38 r	55	Free Rolling	S1	3	L1	
552-12	552-15	Flat-Dry	38 r	55	Free Rolling	S1	6	L1	
552-13	552-16	Flat-Dry	29 r	55	Free Rolling	S1	0	L1	
552-14	552-17	Flat-Dry	29 r	55	Free Rolling	S1	3	L1	

* Inflation Pressure c: Capped
r: Regulated
v: Vented

Comments C1 : Severe tread separation, SA = -30 deg. @ 3200 lb. load
Comments C4 : Retested as Run 16
Comments C5 : Retested as Run 17
Comments C9 : Data Invalid, Calibration Error
Normal Load Schedule L1 : 800, 1200, 1800, 2400, 3000
Slip Angle Schedule S1 : -6 → + 30 → -30 → + 6

TEST SCHEDULE

FORD

RUN	TIRE	ROAD CONDITION	P * psi	V mph	SLIP RATIO	SA deg	IA deg	LOAD lb	COMMENTS /RUN TIME
552-15	552-13	Flat-Dry	29 r	55	Free Rolling	S1	6	L1	
552-16	552-7	Flat-Dry	29 r	55	Free Rolling	S1	0	L1	C1,C2
552-17	552-8	Flat-Dry	29 r	55	Free Rolling	S1	2	L1	C1,C3

* Inflation Pressure c: Capped
r: Regulated
v: Vented

Comments C1 : Severe tread separation, SA=-30 deg. @ 3000 lb. load
Comments C2 : Repeat of Run 1
Comments C3 : Repeat of Run 2
Normal Load Schedule L1 : 600, 1200, 1800, 2400, 3000
Slip Angle Schedule S1 : -5 → + 30 → -30 → + 5

EXPT 1303

FORD

RUN NUMBER: 552-2 **DATE 02/06/89**

TYPE OF TEST: FREE ROLLING CORNERING TEST

Data Filters: 10 Hz.

TIRE:

Sponsor Code: FR480 M+S
TIRF Number: 552-2
Size: P245/70R15
Rim Width (in): 7.00

ROAD SURFACE:

Wet S/N: 45
Dry S/N: 85
Water Depth (in): 0.00

NOMINAL VALUES OF TEST PARAMETERS

1. Velocity (mph)	55
2. Slip Ratio	Free Rolling
3. Slip Angle (deg)	-5 → +30 → -30 → +5
4. Slip Angle Rate (deg/sec)	7
5. Inclination Angle (deg)	3
6. Vertical Load (lbs)	500, 1200, 1[illegible]0, 2400, 3000
7. Inflation Pressure (psi)	29 Regulated

NOTES AND COMMENTS

— 10 min. warm-up at 55mph, 1800lb load

— Severe tread separation, SA=-30 deg. @ 3000 lb. load

— Retested as Run 17

FORD

RUN NUMBER: 552-1 **DATE 02/05/80**

TYPE OF TEST: FREE ROLLING CORNERING TEST

Data Filters: 10 Hz.

TIRE:	**ROAD SURFACE:**	
Sponsor Code: FR480 M+S	**Wet S/N:**	**45**
TIRF Number: 552-1	**Dry S/N:**	**85**
Size: P245/70R15	**Water Depth (in):**	**0.00**
Rim Width (in): 7.00		

NOMINAL VALUES OF TEST PARAMETERS

1. Velocity (mph)	**55**
2. Slip Ratio	**Free Rolling**
3. Slip Angle (deg)	**-5 → +30 → -30 → +5**
4. Slip Angle Rate (deg/sec)	**7**
5. Inclination Angle (deg)	**0**
6. Vertical Load (lbs)	**500, 1200, 1800, 2400, 3000**
7. Inflation Pressure (psi)	**29 Regulated**

NOTES AND COMMENTS

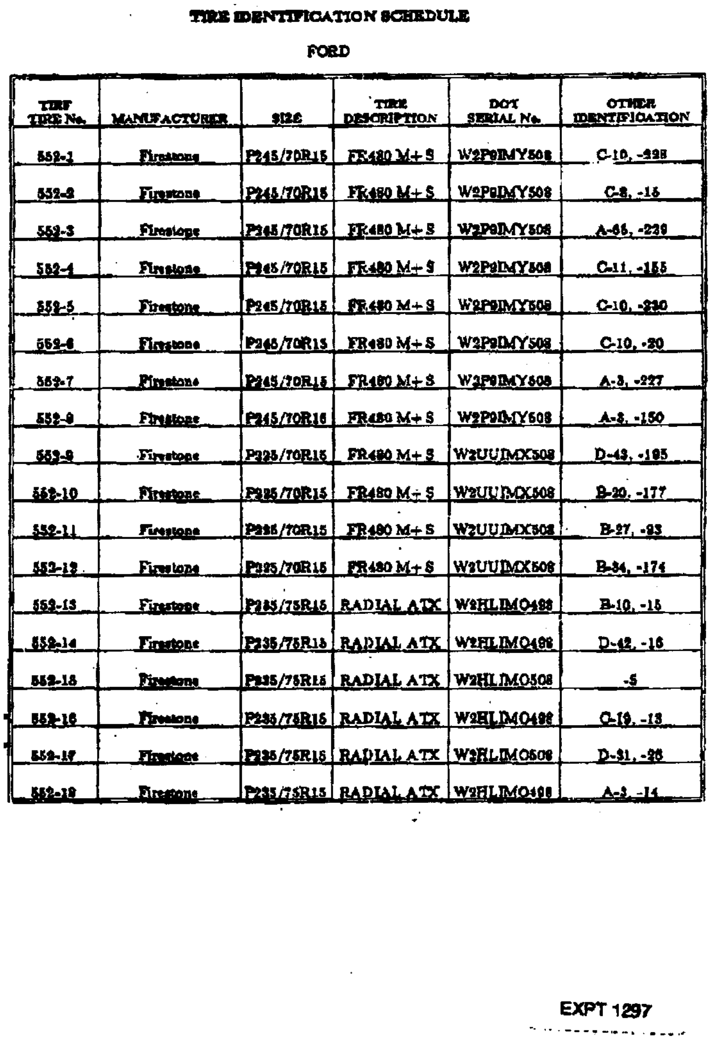
— 10 min. warm-up at 55mph, 1800lb load

— Severe tread separation, SA=-30 deg. @ 3000 lb. load

— Data Invalid, Calibration Error

— Retested as Run 16

EXPT 1295



TIRE IDENTIFICATION SCHEDULE

FORD

TIRF TIRE No.	MANUFACTURER	SIZE	TIRE DESCRIPTION	DOT SERIAL No.	OTHER IDENTIFICATION
552-1	Firestone	P245/70R15	FR480 M+S	W2P9IMY508	C-10, -228
552-2	Firestone	P245/70R15	FR480 M+S	W2P9IMY508	C-8, -16
552-3	Firestone	P245/70R15	FR480 M+S	W2P9IMY508	A-66, -239
552-4	Firestone	P245/70R15	FR480 M+S	W2P9IMY508	C-11, -155
552-5	Firestone	P245/70R15	FR480 M+S	W2P9IMY508	C-10, -230
552-6	Firestone	P245/70R15	FR480 M+S	W2P9IMY508	C-10, -20
552-7	Firestone	P245/70R15	FR480 M+S	W2P9IMY508	A-3, -227
552-8	Firestone	P245/70R15	FR480 M+S	W2P9IMY508	A-3, -150
552-9	Firestone	P235/70R15	FR480 M+S	W2UUIMX508	D-43, -195
552-10	Firestone	P235/70R15	FR480 M+S	W2UUIMX508	B-20, -177
552-11	Firestone	P235/70R15	FR480 M+S	W2UUIMX508	B-27, -93
552-12	Firestone	P235/70R15	FR480 M+S	W2UUIMX508	B-34, -174
552-13	Firestone	P235/75R15	RADIAL ATX	W2HLIMO498	B-10, -15
552-14	Firestone	P235/75R15	RADIAL ATX	W2HLIMO498	D-42, -16
552-15	Firestone	P235/75R15	RADIAL ATX	W2HLIMO508	-5
552-16	Firestone	P235/75R15	RADIAL ATX	W2HLIMO498	C-19, -13
552-17	Firestone	P235/75R15	RADIAL ATX	W2HLIMO508	D-31, -26
552-18	Firestone	P235/75R15	RADIAL ATX	W2HLIMO498	A-3, -14

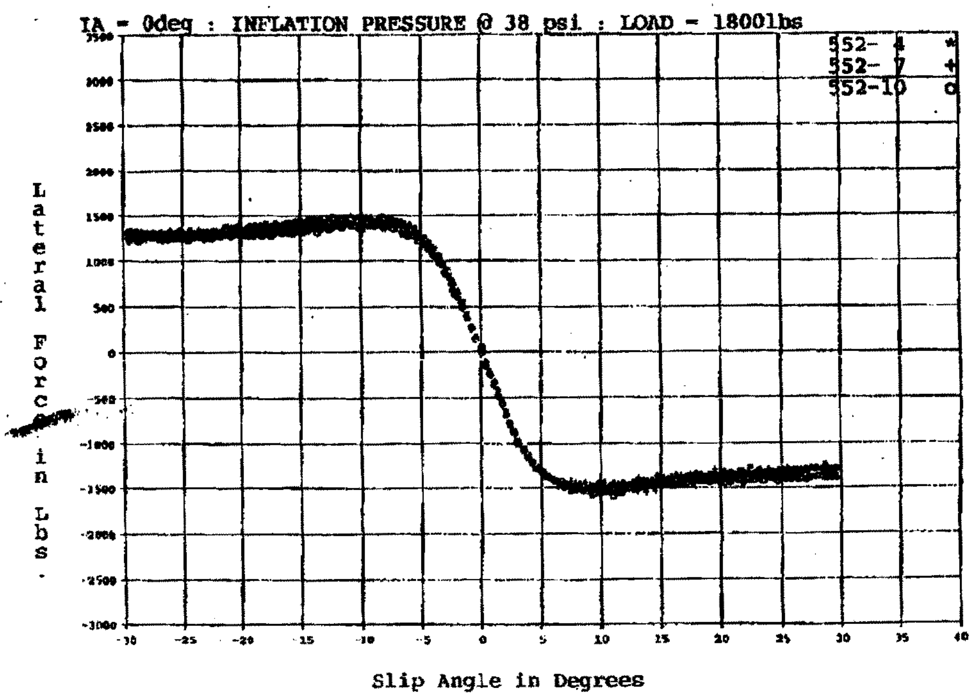
EXPT 1297

TIRE IDENTIFICATION SCHEDULE

FORD

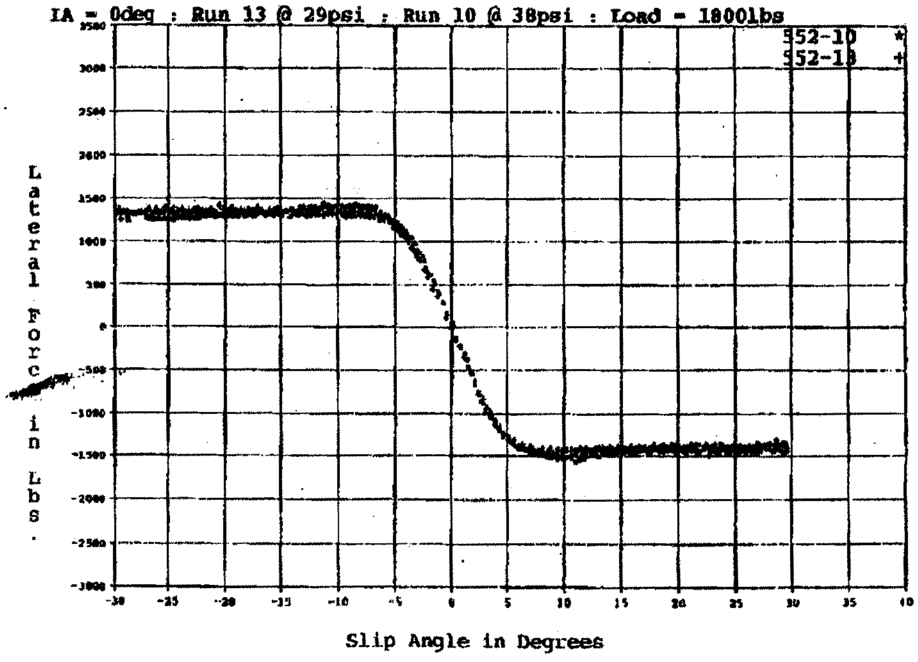
TRP TIRE No.	MANUFACTURER	SIZE	TIRE DESCRIPTION	DOT SERIAL No.	OTHER IDENTIFICATION
552-19	Firestone	P235/75R15	RADIAL ATX	W2HLJMO508	C-8, -4
552-20	Firestone	P235/75R15	RADIAL ATX	W2HLJMO508	D-42 -3

EXPT 1296

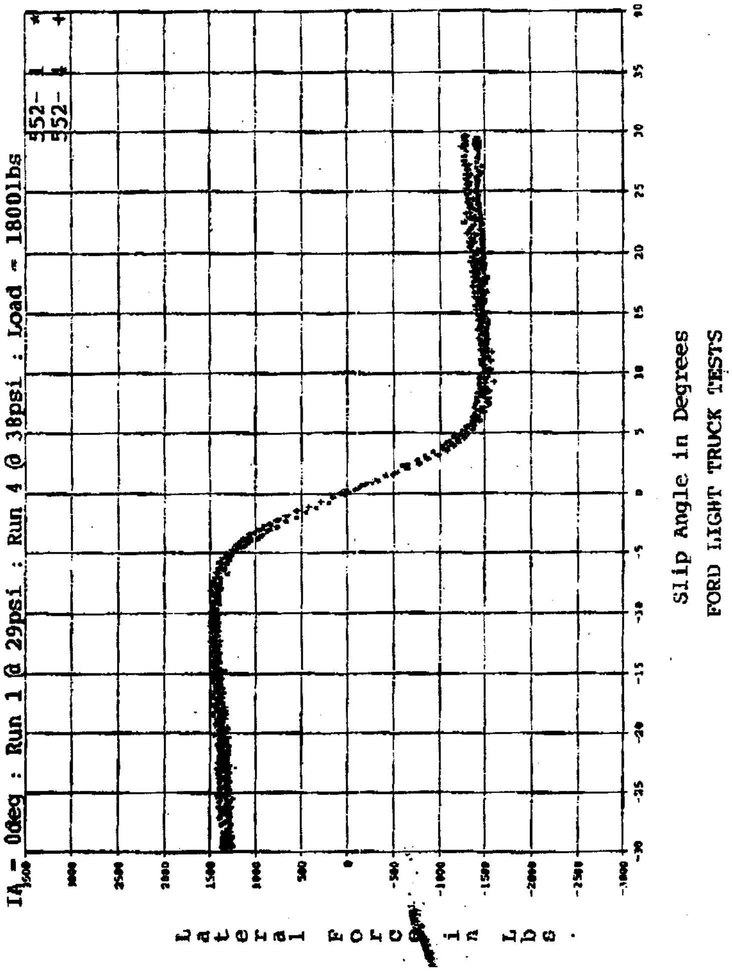


FORD LIGHT TRUCK TESTS

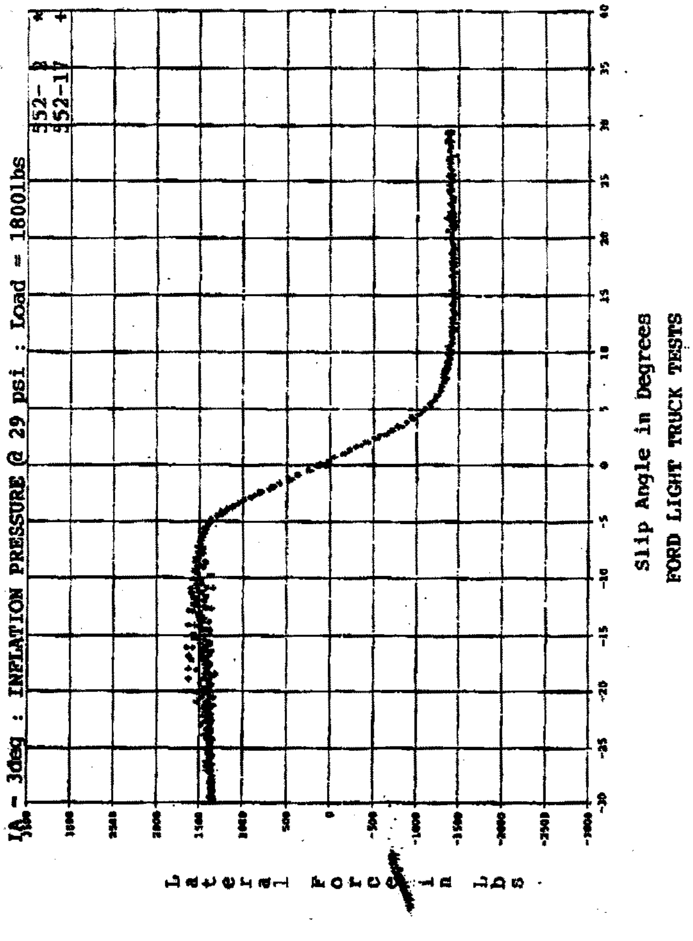
EXPT 1298



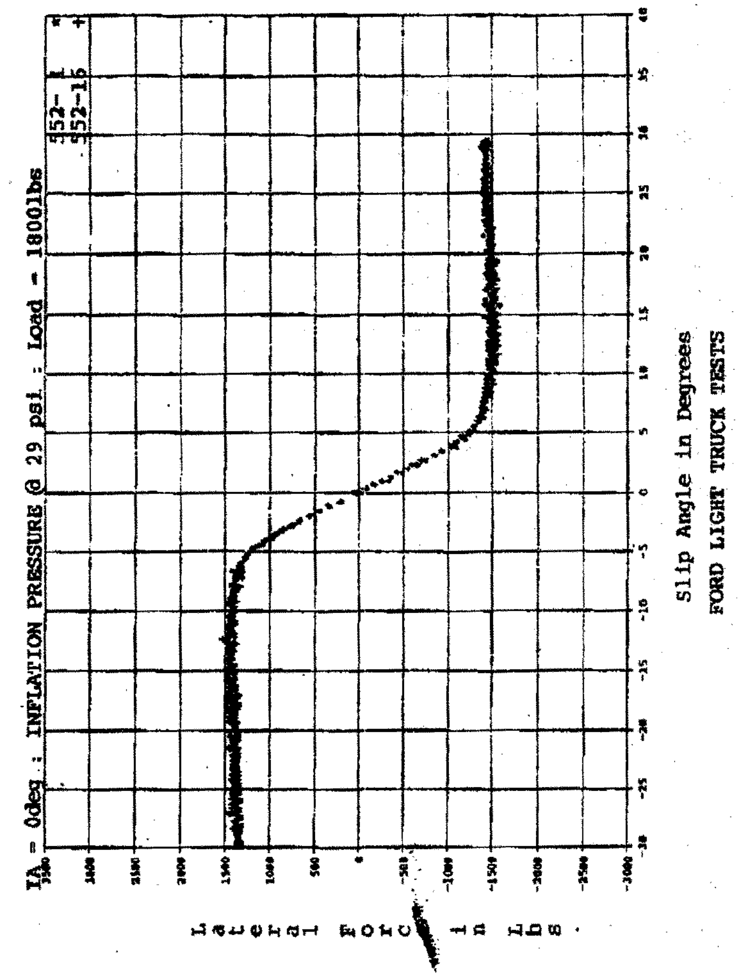
FORD LIGHT TRUCK TESTS


IA = 0deg : Run 1 @ 29psi : Run 4 @ 38psi : Load = 1800lbs
552-1 *
552-4 +
3500
3000
2500
2000
1500
1000
500
0
-500
-1000
-1500
-2000
-2500
-3000
-30
-25
-20
-15
-10
-5
0
5
10
15
20
25
30
35
40
Lateral Force in Lbs.
Slip Angle in Degrees
FORD LIGHT TRUCK TESTS

EXPT 1300


IA - 3deg : INFLATION PRESSURE @ 29 psi : Load = 1800lbs
552-8
552-17
Lateral Force in Lbs
3000
2500
2000
1500
1000
500
0
-500
-1000
-1500
-2000
-2500
-3000
-30
-25
-20
-15
-10
-5
0
5
10
15
20
25
30
35
40
Slip Angle in Degrees
FORD LIGHT TRUCK TESTS

EXPT 1301


IA = 0deg : INFLATION PRESSURE @ 29 psi : Load = 1800lbs
552-1 *
552-16 +
3500
3000
2500
2000
1500
1000
500
0
-500
-1000
-1500
-2000
-2500
-3000
-30
-25
-20
-15
-10
-5
0
5
10
15
20
25
30
35
40
Lateral Force in Lbs.
Slip Angle in Degrees
FORD LIGHT TRUCK TESTS

EXPT 1302

FORD

RUN NUMBER: 552-5
DATE 02/06/89
TYPE OF TEST: FREE ROLLING CORNERING TEST
Data Filters: 10 Hz.

TIRE:

Sponsor Code: FR480 M+S
TIRF Number: 552-5
Size: P245/70R15
Rim Width (in): 7.00

ROAD SURFACE:

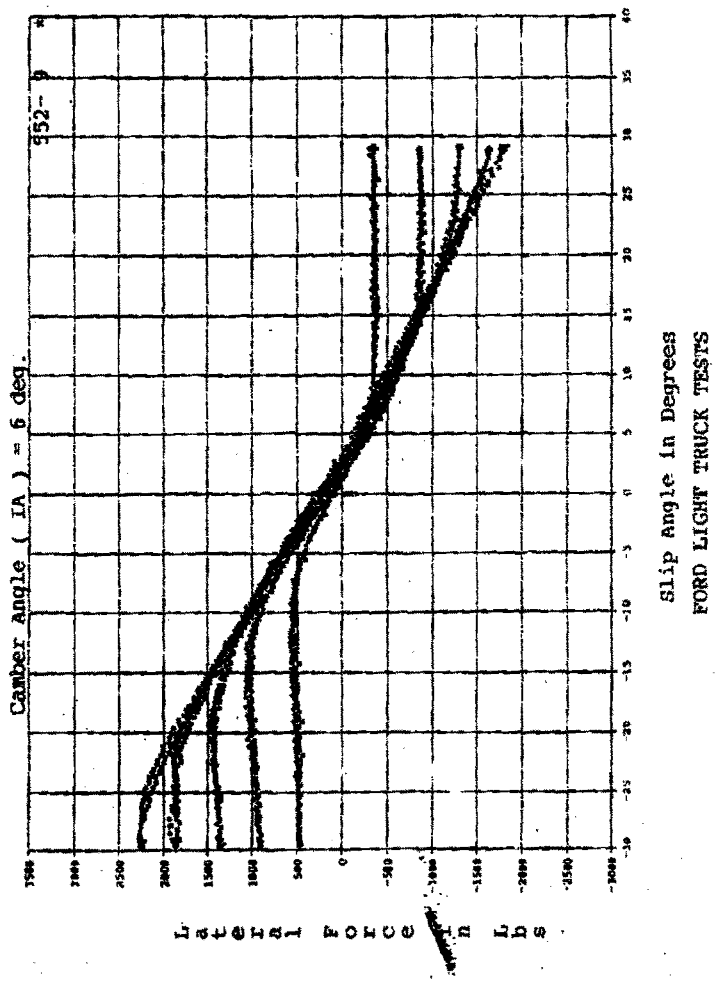
Wet S/N:	45
Dry S/N:	85
Water Depth (in):	0.00

NOMINAL VALUES OF TEST PARAMETERS

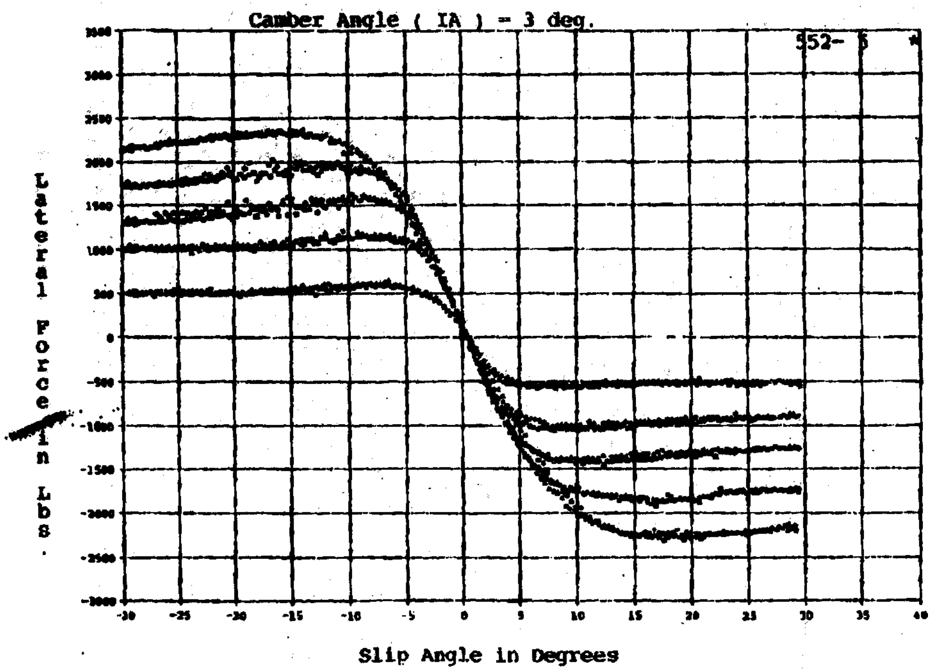
1. Velocity (mph)	55
2. Slip Ratio	Free Rolling
3. Slip Angle (deg)	-5 → +30 → -30 → +5
4. Slip Angle Rate (deg/sec)	7
5. Inclination Angle (deg)	3
6. Vertical Load (lbs)	500, 1200, 1800, 2400, 3000
7. Inflation Pressure (psi)	38 Regulated

NOTES AND COMMENTS

— 10 min. warm-up at 55mph, 1800lb load

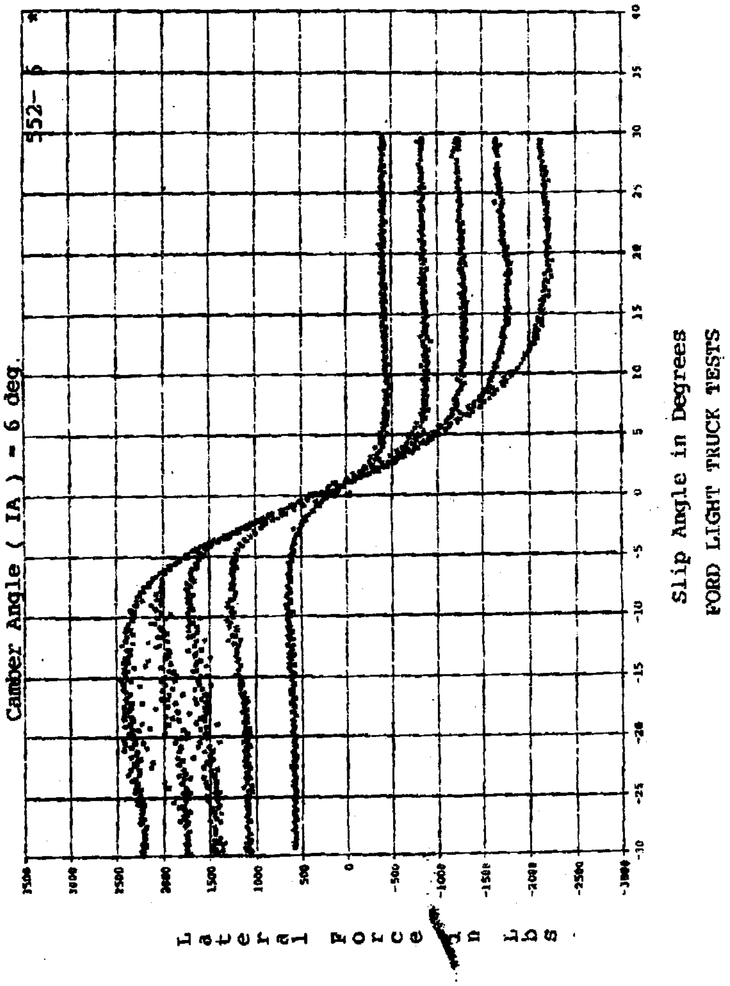

Camber Angle (IA) = 6 deg.
952-9
Lateral Force in Lbs
3500
3000
2500
2000
1500
1000
500
0
-500
-1000
-1500
-2000
-2500
-3000
-30
-25
-20
-15
-10
-5
0
5
10
15
20
25
30
35
40
Slip Angle in Degrees
FORD LIGHT TRUCK TESTS

EXPT 1306



FORD LIGHT TRUCK TESTS

EXPT 1307


Camber Angle (IA) = 6 deg.
552-
Slip Angle in Degrees
FORD LIGHT TRUCK TESTS
Lateral Force in Lbs.
-30
-25
-20
-15
-10
-5
0
5
10
15
20
25
30
35
40
3500
3000
2500
2000
1500
1000
500
0
-500
-1000
-1500
-2000
-2500
-3000

EXPT 1308

FORD

RUN NUMBER: 552-6 DATE 02/06/89

TYPE OF TEST: FREE ROLLING CORNERING TEST

Data Filters: 10 Hz.

TIRE:

Sponsor Code: FR480 M+S
TIRF Number: 552-6
Size: P245/70R15
Rim Width (in): 7.00

ROAD SURFACE:

Wet S/N: 45
Dry S/N: 85
Water Depth (in): 0.00

NOMINAL VALUES OF TEST PARAMETERS

1. Velocity (mph)	55
2. Slip Ratio	Free Rolling
3. Slip Angle (deg)	-5 → +30 → -30 → +5
4. Slip Angle Rate (deg/sec)	7
5. Inclination Angle (deg)	6
6. Vertical Load (lbs)	500, 1200, 1800, 2400, 3000
7. Inflation Pressure (psi)	38 Regulated

NOTES AND COMMENTS

— 10 min. warm-up at 55mph, 1800lb load

FORD

RUN NUMBER: 552-7 DATE 02/06/89

TYPE OF TEST: FREE ROLLING CORNERING TEST

Data Filters: 10 Hz.

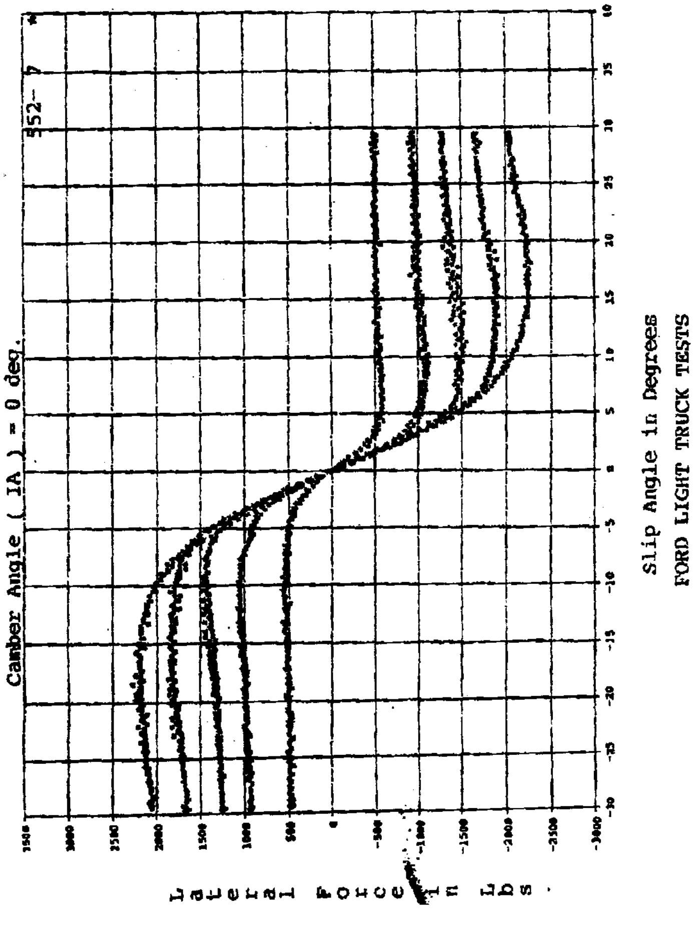
TIRE:	ROAD SURFACE:	
Sponsor Code: FR480 M+S	Wet S/N:	45
TIRF Number: 552-9	Dry S/N:	85
Size: P225/70R15	Water Depth (in):	0.00
Rim Width (in): 7.00		

NOMINAL VALUES OF TEST PARAMETERS

1. Velocity (mph)	55
2. Slip Ratio	Free Rolling
3. Slip Angle (deg)	-5 → +30 → -30 → +5
4. Slip Angle Rate (deg/sec)	7
5. Inclination Angle (deg)	0
6. Vertical Load (lbs)	500, 1200, 1800, 2400, 3000
7. Inflation Pressure (psi)	38 Regulated

NOTES AND COMMENTS

— 10 min. warm-up at 55mph, 1800lb load


Camber Angle (IA) = 0 deg.
552- 7
Slip Angle in Degrees
FORD LIGHT TRUCK TESTS
Lateral Force in Lbs.
3500
3000
2500
2000
1500
1000
500
0
-500
-1000
-1500
-2000
-2500
-3000
40
35
30
25
20
15
10
5
0
-5
-10
-15
-20
-25
-30

EXPT 1311

FORD

RUN NUMBER: 552-8 **DATE 02/06/89**

TYPE OF TEST: FREE ROLLING CORNERING TEST

Data Filters: 10 Hz.

TIRE:

Sponsor Code: FR480 M+S
TIRF Number: 552-10
Size: P225/70R15
Rim Width (in): 7.00

ROAD SURFACE:

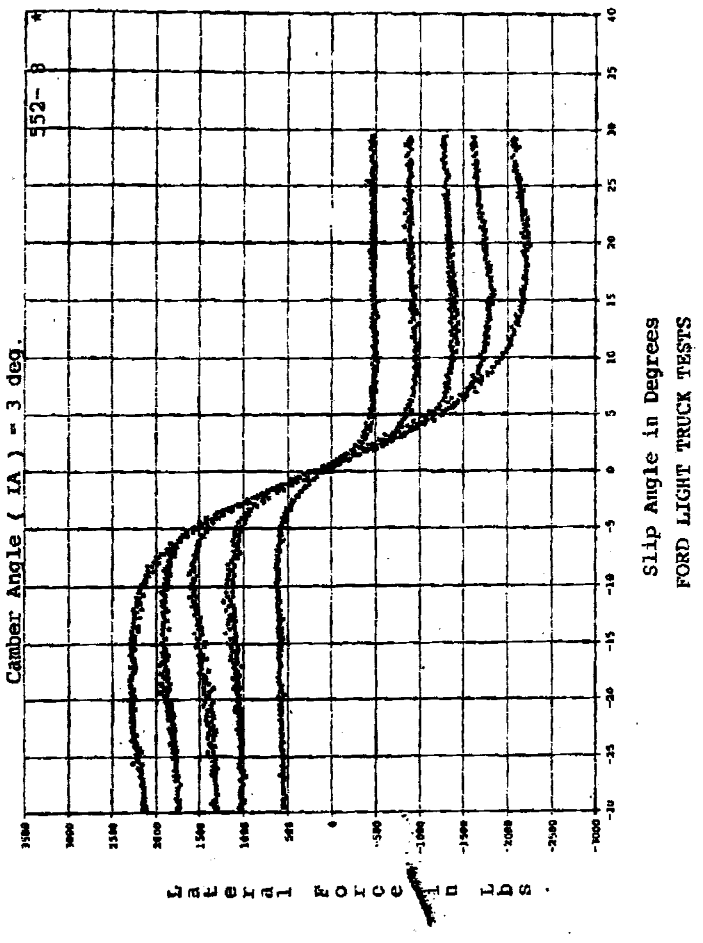
Wet S/N: 45
Dry S/N: 85
Water Depth (in): 0.00

NOMINAL VALUES OF TEST PARAMETERS

1. Velocity (mph)	55
2. Slip Ratio	Free Rolling
3. Slip Angle (deg)	-5 → +30 → -30 → +5
4. Slip Angle Rate (deg/sec)	7
5. Inclination Angle (deg)	3
6. Vertical Load (lbs)	500, 1200, 1800, [illegible], 3000
7. Inflation Pressure (psi)	38 Regulated

NOTES AND COMMENTS

— 10 min. warm-up at 55mph, 1800lb load



Camber Angle (IA) = 3 deg.
552- 8
Slip Angle in Degrees
FORD LIGHT TRUCK TESTS
Lateral Force in Lbs.
3500
3000
2500
2000
1500
1000
500
0
-500
-1000
-1500
-2000
-2500
-3000
-30
-25
-20
-15
-10
-5
0
5
10
15
20
25
30
35
40

EXPT 1313

FORD

RUN NUMBER: 552-9 DATE 02/06/89

TYPE OF TEST: FREE ROLLING CORNERING TEST

Data Filters: 10 Hz.

TIRE:	ROAD SURFACE:	
Sponsor Code: FR480 M+S	Wet S/N:	45
TIRF Number: 552-11	Dry S/N:	85
Size: P225/70R15	Water Depth (in):	0.00
Rim Width (in): 7.00		

NOMINAL VALUES OF TEST PARAMETERS

1. Velocity (mph)	55
2. Slip Ratio	Free Rolling
3. Slip Angle (deg)	-5 → +30 → -30 → +5
4. Slip Angle Rate (deg/sec)	7
5. Inclination Angle (deg)	6
6. Vertical Load (lbs)	500, 1200, 1800, 2400, 3000
7. Inflation Pressure (psi)	38 Regulated

NOTES AND COMMENTS

— 10 min. warm-up at 55mph, 1800lb load

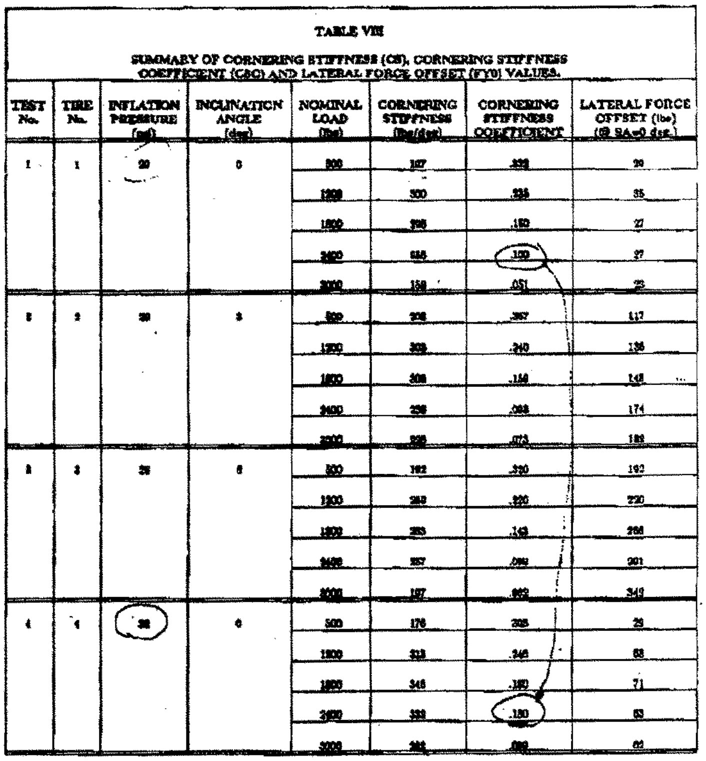


TABLE VIII

SUMMARY OF CORNERING STIFFNESS (CS), CORNERING STIFFNESS COEFFICIENT (CSC) AND LATERAL FORCE OFFSET (FY0) VALUES.

TEST No.	TIRE No.	INFLATION PRESSURE (psi)	INCLINATION ANGLE (deg)	NOMINAL LOAD (lbs)	CORNERING STIFFNESS (lbs/deg)	CORNERING STIFFNESS COEFFICIENT	LATERAL FORCE OFFSET (lbs) (@ SA=0 deg.)
1	1	20	0	500	167	.333	20
				1200	300	.235	35
				1800	295	.160	27
				2400	255	.100	27
				3000	158	.051	23
2	2	30	3	500	208	.387	117
				1200	303	.240	136
				1800	308	.158	148
				2400	238	.093	174
				3000	228	.073	183
3	3	25	6	500	162	.320	192
				1200	265	.220	220
				1800	255	.143	266
				2400	237	.099	291
				3000	187	.062	349
4	4	38	0	500	176	.355	23
				1200	323	.346	63
				1800	348	.190	71
				2400	333	.150	63
				3000	268	.089	62

DRAFT

EXPT 1250

TABLE VIII (cont'd)

SUMMARY OF CORNERING STIFFNESS (CS), CORNERING STIFFNESS COEFFICIENT (CSC) AND LATERAL FORCE OFFSET (FY0) VALUES.

TEST No.	TIRE No.	INFLATION PRESSURE (psi)	INCLINATION ANGLE (deg)	NOMINAL LOAD (lbs)	CORNERING STIFFNESS (lbs/deg)	CORNERING STIFFNESS COEFFICIENT	LATERAL FORCE OFFSET (lbs) (@ SA=0 deg.)
5	5	28	3	600	185	.325	90
				1200	308	.244	130
				1800	361	.184	140
				2400	308	.133	151
				3000	273	.087	171
6	6	32	0	600	183	.355	185
				1200	317	.266	245
				1800	342	.178	202
				2400	322	.134	321
				3000	[illegible]	.090	372
7	9	28	0	600	180	.300	19
				1200	313	.345	23
				1800	341	.170	19
				2400	305	.130	4
				3000	295	.097	-2
8	10	28	3	600	174	.312	87
				1200	290	.330	112
				1800	280	.183	156
				2400	317	.138	195
				3000	293	.085	227

TABLE VIII (cont'd)

SUMMARY OF CORNERING STIFFNESS (CS), CORNERING STIFFNESS COEFFICIENT (CSC) AND LATERAL FORCE OFFSET (FY0) VALUES.

TEST No.	TIRE No.	INFLATION PRESSURE (psi)	INCLINATION ANGLE (deg)	NOMINAL LOAD (lbs)	CORNERING STIFFNESS (lbs/deg)	CORNERING STIFFNESS COEFFICIENT	LATERAL FORCE OFFSET (lbs) (@ SA=0 deg.)
9	11	30	5	600	75	.194	90
				1200	90	.077	136
				1800	90	.048	202
				2400	95	.038	237
				3000	84	.030	275
10	13	26	0	600	154	.255	21
				1200	298	.238	34
				1800	337	.177	34
				2400	338	.140	11
				3000	301	.102	14
11	14	36	3	600	166	.278	82
				1200	301	.250	108
				1800	344	.179	113
				2400	358	.141	113
				3000	316	.101	134
12	15	28	6	600	158	.272	137
				1200	280	.230	168
				1800	337	.178	177
				2400	340	.135	210
				3000	318	.098	256

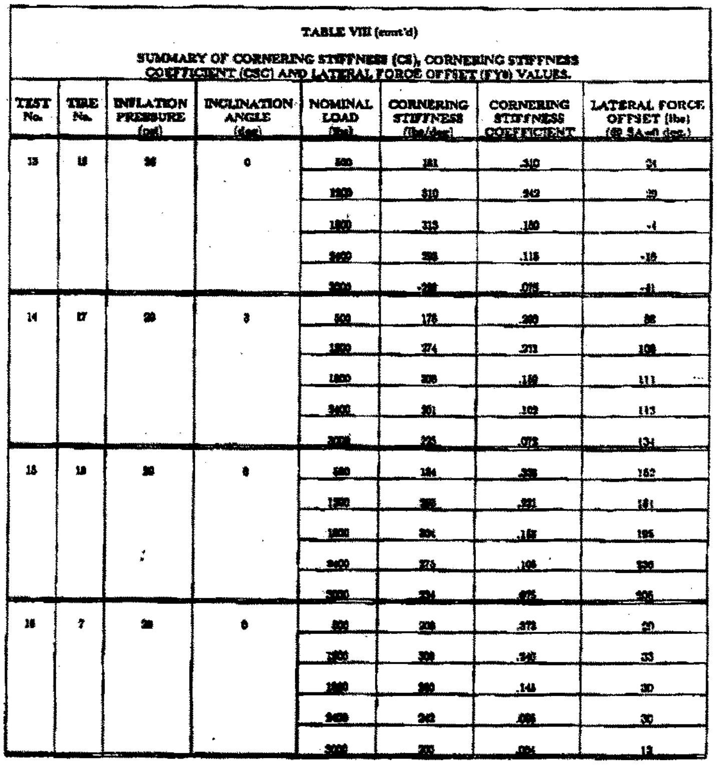


TABLE VIII (cont'd)

SUMMARY OF CORNERING STIFFNESS (CS), CORNERING STIFFNESS COEFFICIENT (CSC) AND LATERAL FORCE OFFSET (FY0) VALUES.

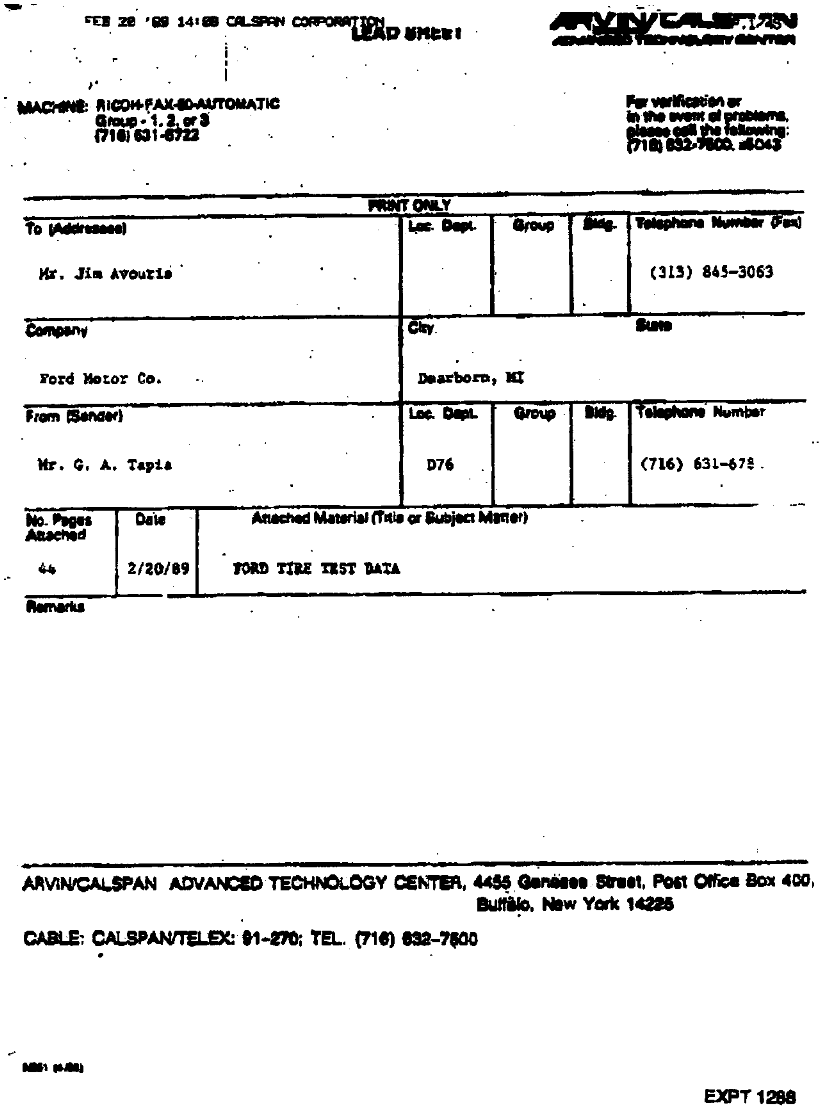
TEST No.	TIRE No.	INFLATION PRESSURE (psi)	INCLINATION ANGLE (deg)	NOMINAL LOAD (lbs)	CORNERING STIFFNESS (lbs/deg)	CORNERING STIFFNESS COEFFICIENT	LATERAL FORCE OFFSET (lbs) (@ SA=0 deg.)
13	18	26	0	600	181	.310	31
				1200	310	.242	29
				1800	313	.180	-4
				2400	283	.118	-16
				3000	228	.076	-41
14	17	26	3	600	178	.290	88
				1200	274	.231	108
				1800	308	.169	111
				2400	301	.102	113
				3000	225	.075	134
15	19	26	0	600	184	.306	152
				1200	265	.221	181
				1800	304	.169	195
				2400	275	.106	226
				3000	224	.075	205
16	7	26	0	600	208	.373	20
				1200	308	.242	33
				1800	260	.144	30
				2400	242	.098	30
				3000	205	.068	12

TABLE VIII (cont'd)

SUMMARY OF CORNERING STIFFNESS (CS), CORNERING STIFFNESS COEFFICIENT (CSC) AND LATERAL FORCE OFFSET (FYO) VALUES.

TEST No.	TIRE No.	INFLATION PRESSURE (psi)	INCLINATION ANGLE (deg)	NOMINAL LOAD (lbs)	CORNERING STIFFNESS (lbs/deg)	CORNERING STIFFNESS COEFFICIENT	LATERAL FORCE OFFSET (lbs) (@ SA=0 deg.)
17	4	29	3	600	189	.348	103
				1200	308	.244	119
				1800	270	.150	135
				2400	253	.100	150
				3000	191	.062	165

DRAFT



FEB 20 '89 14:08 CALSPAN CORPORATION

1/45

ARVIN/CALSPAN
ADVANCED TECHNOLOGY CENTER

LEAD SHEET

MACHINE: RICOH-FAX-60-AUTOMATIC
Group - 1, 2, or 3
(716) 631-6722

For verification or
in the event of problems,
please call the following:
(716) 632-7500, x6043

PRINT ONLY

To (Addressee)	Loc. Dept.	Group	Bldg.	Telephone Number (Fax)
Mr. Jim Avouris				(313) 845-3063

Company	City	State
Ford Motor Co.	Dearborn, MI	

From (Sender)	Loc. Dept.	Group	Bldg.	Telephone Number
Mr. G. A. Tapia	D76			(716) 631-678

No. Pages Attached	Date	Attached Material (Title or Subject Matter)
44	2/20/89	FORD TIRE TEST DATA

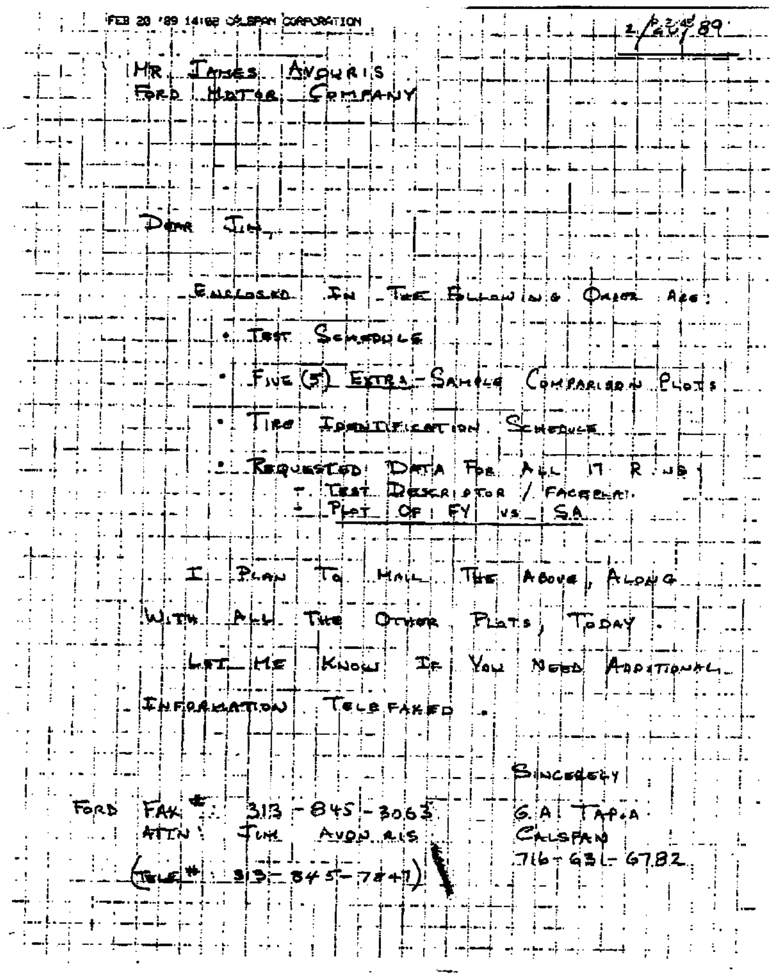
Remarks

ARVIN/CALSPAN ADVANCED TECHNOLOGY CENTER, 4455 Genesee Street, Post Office Box 400,
Buffalo, New York 14225

CABLE: CALSPAN/TELEX: 91-270; TEL. (716) 632-7500

8851 (4-86)

EXPT 1288



FEB 20 '89 14:02 CALSPAN CORPORATION

2:45
2/20/89

MR. JAMES AVOURIS
FORD MOTOR COMPANY

DEAR JIM,

ENCLOSED IN THE FOLLOWING ORDER ARE:

- TEST SCHEDULE
- FIVE (5) EXTRA-SAMPLE COMPARISON PLOTS
- TIRE IDENTIFICATION SCHEDULE
- REQUESTED DATA FOR ALL 17 RUNS;
  - TEST DESCRIPTOR / FACESHEET
  - PLOT OF FY VS SA

I PLAN TO MAIL THE ABOVE, ALONG WITH ALL THE OTHER PLOTS, TODAY.

LET ME KNOW IF YOU NEED ADDITIONAL INFORMATION TELEFAXED.

SINCERELY
G. A. TAPIA
CALSPAN
716-631-6782

FORD FAX #: 313-845-3063
ATTN: JIM AVOURIS
(TELE #: 313-845-7847)

EXPT 1289

FORD

RUN NUMBER: 552-4 DATE 02/06/89

TYPE OF TEST: FREE ROLLING CORNERING TEST

Data Filters: 10 Hz.

TIRE:

Sponsor Code: FR480 M+S
TIRF Number: 552-4
Size: P245/70R15
Rim Width (in): 7.00

ROAD SURFACE:

Wet S/N: 45
Dry S/N: 85
Water Depth (in): 0.00

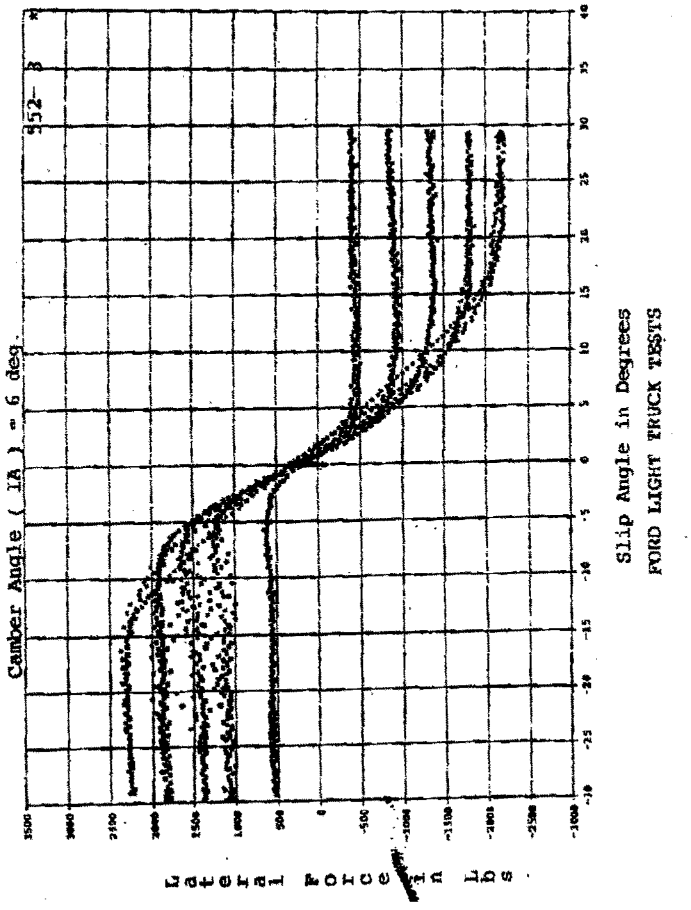
NOMINAL VALUES OF TEST PARAMETERS

1. Velocity (mph)	55
2. Slip Ratio	Free Rolling
3. Slip Angle (deg)	-5 → +30 → -30 → +5
4. Slip Angle Rate (deg/sec)	7
5. Inclination Angle (deg)	0
6. Vertical Load (lbs)	500, 1200, 1800, 2400, 3000
7. Inflation Pressure (psi)	38 Regulated

NOTES AND COMMENTS

— 10 min. warm-up at 55mph, 1800lb load

EXPT 1290


552-3
Camber Angle (IA) = 6 deg.
3500
3000
2500
2000
1500
1000
500
0
-500
-1000
-1500
-2000
-2500
-3000
Lateral Force in Lbs
-30
-25
-20
-15
-10
-5
0
5
10
15
20
25
30
35
40
Slip Angle in Degrees
FORD LIGHT TRUCK TESTS

EXPT 1291

FORD

RUN NUMPER: 552-3 DATE 02/08/89

TYPE OF TEST: FREE ROLLING CORNERING TEST

Data Filters: 10 Hz.

TIRE:

Sponsor Code: FR480 M+S
TIRF Number: 552-3
Size: P245/70R15
Rim Width (in): 7.00

ROAD SURFACE:

Wet S/N: 45
Dry S/N: 85
Water Depth (in): 0.00

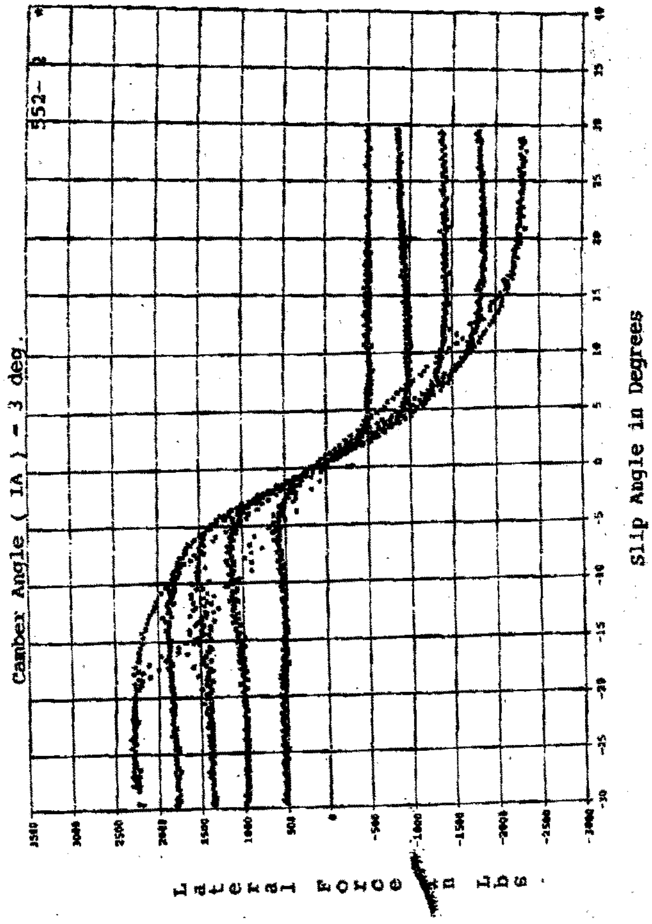
NOMINAL VALUES OF TEST PARAMETERS

1. Velocity (mph)	55
2. Slip Ratio	Free Rolling
3. Slip Angle (deg)	-5 → + 30 → -30 → + 5
4. Slip Angle Rate (deg/sec)	7
5. Inclination Angle (deg)	6
6. Vertical Load (lbs)	500, 1200, 1800, 2400, 3000
7. Inflation Pressure (psi)	29 Regulated

NOTES AND COMMENTS

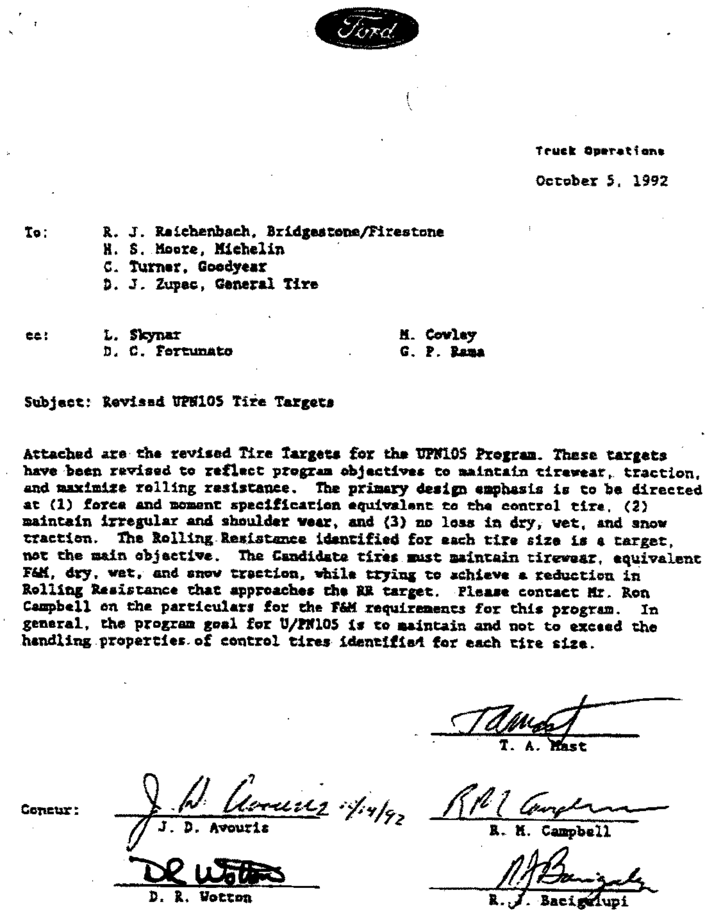
— 10 min. warm-up at 55mph, 1800lb load

— Severe tread separation, SA=-30 deg. @ 3000 lb. load



FORD LIGHT TRUCK TESTS

EXPT 1293



Ford

Truck Operations

October 5, 1992

To: R. J. Reichenbach, Bridgestone/Firestone
H. S. Moore, Michelin
C. Turner, Goodyear
D. J. Zupec, General Tire

cc: L. Skynar
D. C. Fortunato
M. Cowley
G. P. Rama

Subject: Revised UPN105 Tire Targets

Attached are the revised Tire Targets for the UPN105 Program. These targets have been revised to reflect program objectives to maintain tirewear, traction, and maximize rolling resistance. The primary design emphasis is to be directed at (1) force and moment specification equivalent to the control tire, (2) maintain irregular and shoulder wear, and (3) no loss in dry, wet, and snow traction. The Rolling Resistance identified for each tire size is a target, not the main objective. The Candidate tires must maintain tirewear, equivalent F&M, dry, wet, and snow traction, while trying to achieve a reduction in Rolling Resistance that approaches the RR target. Please contact Mr. Ron Campbell on the particulars for the F&M requirements for this program. In general, the program goal for U/PN105 is to maintain and not to exceed the handling properties of control tires identified for each tire size.

T. A. Mast

Concur:

J. D. Avouris [illegible]/4/92
J. D. Avouris

R. M. Campbell

DR Wotton
D. R. Wotton

R. J. Baciglupi

10/5/92 REVISED TARGETS - UPN105

CANDIDATE TIRE - P235/75R15 SL ALL TERRAIN OWL WITH 15X7.0JJ WHEEL
(INFO: TIRE ALSO AVAILABLE ON 15X6.0JJ WHEEL)

CONTROL TIRE - P235/75R15 SL AT FIRESTONE ATX SL531J WITH 15X7.0JJ WHEEL

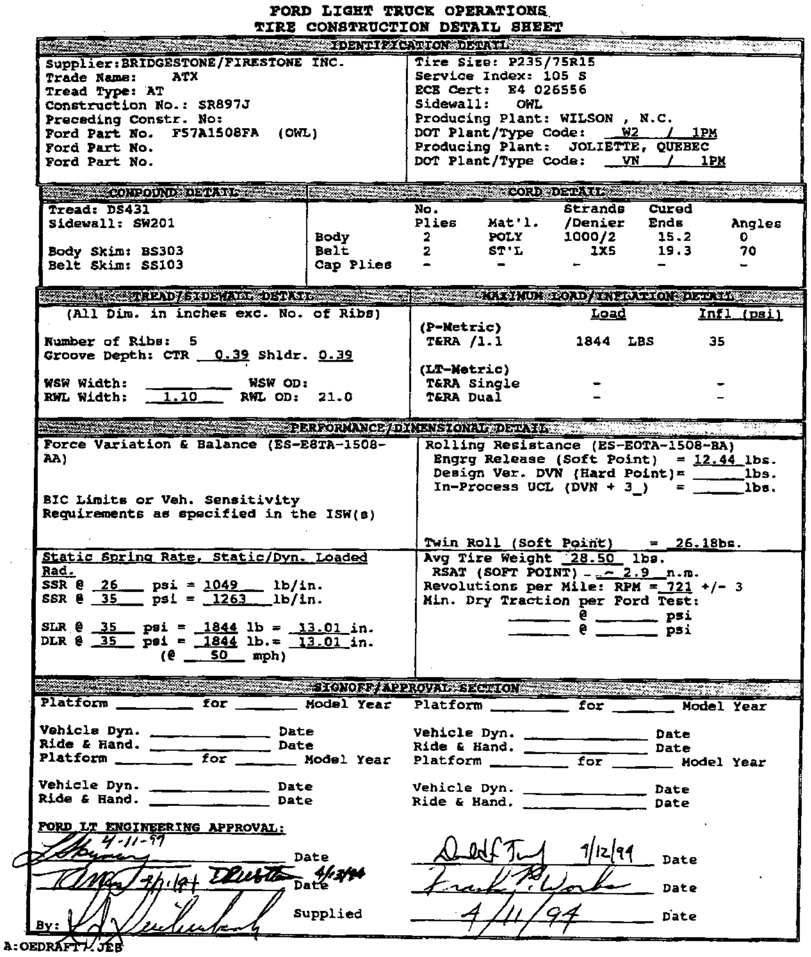
· Irregular wear (10K) (Supplier)	· Estimated life after 10K irregular wear test ≥ Firestone control for both outside and across tread wear. (Siping must be full depth on outside shoulders.) · Worn appearance - subjective ≥ Control (See ES-E8TA-1508-AA)
· Shoulder Wear (5K) (Supplier)	· Estimated life ≥ Firestone control tire. · Worn appearance - subjective ≥ Control (See ES-E8TA-1508-AA)
· Rolling Resistance - Target (Ford/Supplier)	· 67" Drum: ≤ 10.9 lbs. on Ford Test Machine, 7.0" rim, 1402 lbs. load, 38 psi. · Twin Rolls: TBD on Ford Test Machine, 7.0" rim, 1402 lbs. load, 45 psi. NOTE: Primary importance should be placed on the 67" drum rolling resistance. · Raw data and regression equations for above tests must also be submitted to LTE. See B. Whittle letter dated 8/2/90 for data format.
· Traction: Dry/Wet(0.05" H_2O) (Ford/Supplier)	· ≥ Firestone control Rim - 15X7.0 Tire pressure - 30 PSI for Ranger 4X4 Loads: Dry- 855/2137 LBS., Wet- 1453 LBS. Tire pressure - 26 PSI for Explorer Loads: Dry- 796/1992 LBS., Wet- 1354 LBS. Speed: 20, 40, 60 MPH
· 1K Gravel (Supplier)	· Meet ES-E8TA-1508-AA requirement. Worn appearance - subjective ≥ Control
· DOT 109 Lab Test (Supplier)	· Meet ES-E8TA-1508-AA requirement.
· High Speed/Rolloff/Blow Out (Ford/Supplier)	· Meet ES target of 200 miles at 90 mph. Meet SAE "S" speed rating requirements.
· Handling - Dry/Wet (Ford/Supplier)	· Dry - subjective equivalent to Control · Wet - subjective ≥ Control tire on Ford developed wet handling course. · Groove Wander (Los Angeles Freeway test) ≥ Firestone Control

10/5/92 REVISED TARGETS - UPN105

CANDIDATE TIRE - P235/75R15 SL ALL TERRAIN OWL WITH 15X7.0JJ WHEEL

CONTROL TIRE - P235/75R15 SL AT FIRESTONE ATX SL531J WITH 15X7.0JJ WHEEL

· **Ride** (Ford/Supplier)	· Harshness at curb - subjective ≥ Control (Ranger), and 0.5 improvement over Control on Explorer. NOTE: 30/35 psi Ranger, 26/26 psi Explorer.
· **Noise** (Ford/Supplier)	· New - .5 subjective rating better than Control Worn - After 10K Irregular & Shoulder wear test .5 subjective rating better than Control
· Indoor Noise	· Submit data per ES-E8TA-1508-AA
· Snow Traction (Supplier)	· ≥ Control tire (Desired: At 50% tread depth, traction should not drop more than 20% from full tread value.)
Snow - Handling/Braking Events (Ford/Supplier)	· TBD (To be developed by Tire Suppliers and Ford.)
· Weight (Supplier)	· 30 piece ave. ≤ 28.6 lbs.
· Uniformity Values (Supplier)	· Uniformity values must conform to those values outlined in the 12/12/88 BIC letter for the 1995 model year. Minimum Cpk = 1.33 NOTE: May be modified to suit vehicle sensitivity. Sidewall undulation = 0.05" max.
· RPM (Supplier)	· SAE Average = 717 ± 7 RPM @ 1844 lb., 35 psi, 45 mph.
· Sidewall, Shoulder, and Tread Design	· UPN105 tread, shoulder, and sidewall designs should provide the customer with a "Tough Truck" image. Tread depth to meet Engineering Design Information T&RA recommended practice. A square shoulder appearance is desired.
· Residual Aligning Torque (Ford/Supplier)	· +0.5 to -2.5 Newton-meters
· Force & Moment (Ford/Supplier)	· Force & Moment equivalent to Control tire with 15x7.0 rim width at 26 PSI. Use LTE Sept. 15, 1992 procedure. File Control Number is "F5316CWFZ"



FORD LIGHT TRUCK OPERATIONS
TIRE CONSTRUCTION DETAIL SHEET

IDENTIFICATION DETAIL

Supplier: BRIDGESTONE/FIRESTONE INC.
Trade Name: ATX
Tread Type: AT
Construction No.: SR897J
Preceding Constr. No:
Ford Part No. F57A1508FA (OWL)
Ford Part No.
Ford Part No.

Tire Size: P235/75R15
Service Index: 105 S
ECE Cert: E4 026556
Sidewall: OWL
Producing Plant: WILSON , N.C.
DOT Plant/Type Code: W2 / 1PM
Producing Plant: JOLIETTE, QUEBEC
DOT Plant/Type Code: VN / 1PM

COMPOUND DETAIL

Tread: DS431
Sidewall: SW201
Body Skim: BS303
Belt Skim: SS103

CORD DETAIL

	No. Plies	Mat'l.	Strands /Denier	Cured Ends	Angles
Body	2	POLY	1000/2	15.2	0
Belt	2	ST'L	1X5	19.3	70
Cap Plies	-	-	-	-	-

TREAD/SIDEWALL DETAIL

(All Dim. in inches exc. No. of Ribs)

Number of Ribs: 5
Groove Depth: CTR 0.39 Shldr. 0.39
WSW Width: ______ WSW OD:
RWL Width: 1.10 RWL OD: 21.0

MAXIMUM LOAD/INFLATION DETAIL

	Load	Infl (psi)
(P-Metric)		
T&RA /1.1	1844 LBS	35
(LT-Metric)		
T&RA Single	-	-
T&RA Dual	-	-

PERFORMANCE/DIMENSIONAL DETAIL

Force Variation & Balance (ES-E8TA-1508-AA)

BIC Limits or Veh. Sensitivity Requirements as specified in the ISW(s)

Rolling Resistance (ES-EOTA-1508-BA)
Engrg Release (Soft Point) = 12.44 lbs.
Design Ver. DVN (Hard Point)= ______lbs.
In-Process UCL (DVN + 3_) = ______lbs.

Twin Roll (Soft Point) = 26.18bs.

Static Spring Rate, Static/Dyn. Loaded Rad.
SSR @ 26 psi = 1049 lb/in.
SSR @ 35 psi = 1263 lb/in.

SLR @ 35 psi = 1844 lb = 13.01 in.
DLR @ 35 psi = 1844 lb.= 13.01 in.
(@ 50 mph)

Avg Tire Weight 28.50 lbs.
RSAT (SOFT POINT) ~ 2.9 n.m.
Revolutions per Mile: RPM = 721 +/- 3
Min. Dry Traction per Ford Test:
______ @ ______ psi
______ @ ______ psi

SIGNOFF/APPROVAL SECTION

Platform ______ for ______ Model Year

Vehicle Dyn. ______ Date
Ride & Hand. ______ Date
Platform ______ for ______ Model Year

Vehicle Dyn. ______ Date
Ride & Hand. ______ Date

Platform ______ for ______ Model Year

Vehicle Dyn. ______ Date
Ride & Hand. ______ Date
Platform ______ for ______ Model Year

Vehicle Dyn. ______ Date
Ride & Hand. ______ Date

FORD LT ENGINEERING APPROVAL:

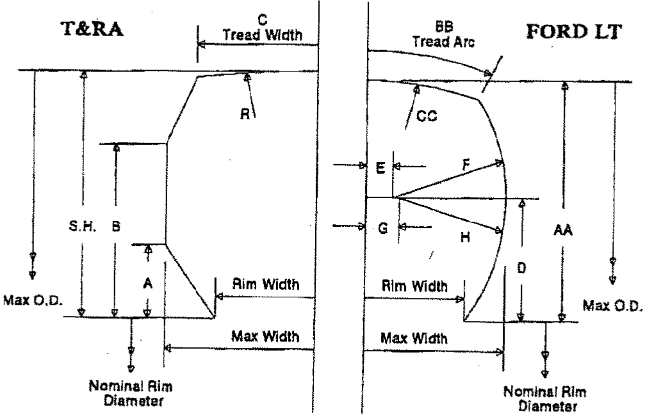
4-11-94 Date
4/11/94 4/13/94 Date
By: Supplied

4/12/94 Date
Date
4/11/94 Date

A:OEDRAFT7.JEB

SIZE: P235/75R15 SUPPLIER: BRIDGESTONE/FIRESTONCONST. #: **SR897J**

FORD LIGHT TRUCK
TIRE COMPOSITE DETAIL SHEET
(RADIAL P-METRIC TIRES)



MAX GROWN DIMENSIONS

RIM WIDTH 6.0

T&RA		FORD LT	
Max O.D.	29.41	Max O.D.	29.29
S.H.	7.20	AA	7.15
C	7.68	BB	6.87
R	37.95	CC	20.00
A	2.17		
B	5.04		
		D	3.57
		E	−0.46
		F	5.08
		G	5.40
		H	−0.78
Max Width	9.61	Max Width	9.24

MAX GROWN DIMENSIONS

RIM WIDTH 7.0

T&RA		FORD LT	
Max O.D.	29.41	Max O.D.	29.29
S.H.	7.20	AA	7.15
C	8.03	BB	6.87
R	39.65	CC	20.00
A	2.17		
B	5.04		
		D	3.57
		E	0.28
		F	4.54
		G	−0.67
		H	5.49
Max Width	10.04	Max Width	9.64

SUPPLIED BY: ______________________ DATE

FORD LT ENGINEERING CONCURRENCE: ______________________ DATE

P235/75R15 UPN 105
PERFORMANCE SUMMARY
CONTROL: SL531J ATX **CANDIDATE: SR897J ATX**

TEST TYPE	TARGET	CANDIDATE
10K IRREGULAR WEAR	= SL531J	RANGER + 33%, = H&T UN105 + 49%, = H&T UN105 - 11%, = H&T**
3.7K SHOULDER WEAR	= SL531J	RANGER + 13%, = H&T UN105 + 10%, = H&T UN105 + 12%, =H&T **
TRACTION	= SL531J	
-- WET		EQUAL
--DRY		EQUAL
SNOW TRACTION	= SL531J	EQUAL FULL SKID EQUAL HALF SKID
SNOW HANDLING	= SL531J	BFS - EQUAL FORD - EQUAL
HANDLING		APPROVED BY FORD
- WET	= SL531J	UN105/RANGER 11/93
- DRY		
RIDE	.5 RTG > SL531J	APPROVED ON UN105/RANGER 11/93
RAT	+ .5 TO - 2.5 NM	-2.9 NM
GROOVE WANDER	=> SL531J	EQUAL ON RANGER
FORCE & MOMENT	= SL531J	EQUIVALENT ON BOTH VEHICLES
ROLLING RESISTANCE		
- DRUM	<= 11.7 #	12.4 #
-TWIN ROLL	TBD	26.2 #
DOT 109 + 48	MEETS	MEETS
HIGH SPEED	'S' SPEED RATED	MEETS 'S' RATING
WEIGHT	<= SL531J (28.5#)	28.5 #

** QUESTIONABLE RESULTS DUE TO VEHICLE REPAIR DURING TESTS

```
************************************************************************
*         Note printed by CSEILNAC on 28 Jan 1999 at 07:58:34          *
************************************************************************

From: GDRAKE  --DRBN006                    Date and time    01/28/99 12:49:27
To: MGUMZ   --DRBN007
cc: CSEILNAC--DRBN007                     DMACKINN--DRBN006
    MKHAIRAL--DRBN007

FROM: Glenn R. Drake                          UAE(UTC +04:00)
Subject: RE: Explorer Firestone issue
```

Melanie,
I just read the Firestone reports on this issue and they are claiming in all cases that this is a repair issue or the customer driving the vehicle in an underinflated situation that causes the tread to separate form the belts.

Regardless of their analysis and conclusions, we have three customers that are not accepting this as "the answer". More importantly, they don't care about Firestone's position because they bought a Ford vehicle and are going to sue the dealer and Ford for the damage caused to their vehicles. Firestone providing a repair procedure for the market will not solve this issue on the basis that this is the repair process throughout the Region and in most parts of the US. What does this say about the durability of their product and why is this not an issue with our other tire lines in the market. Furthermore, I find it rather interesting that we are considering changing the tire currently used in our markets on all Explorers and Mountaineers to a tire that has better high speed durability as used in Europe.

If this was a single case, I would accept Firestone's response as they are the experts in the tire business, case closed. However, we now have three cases and is it possible that Firestone is not telling us the whole story to protect them from a recall or law suit. I feel it is possible, and we owe it to our customers and our shareholders to investigate this for our own piece of mind. I'm recommending that we make our own analysis of the tires from the market to protect ourselves and give our dealers and customers an independent opinion of this issue.

I hope you can understand the Region's and the dealers difficult position we are in because of this unresolved issue.

From: Melanie Gumz
Sent: Wednesday, January 27, 1999 2:08 PM
To: MKHAIRAL
~~cc: DMACKINN, GDRAKE, CSEILNAC, JJOHNS21~~ MG TO M.K 10/28/98
Subject: RE: Explorer Firestone issue

MK TO MG 10/29/98

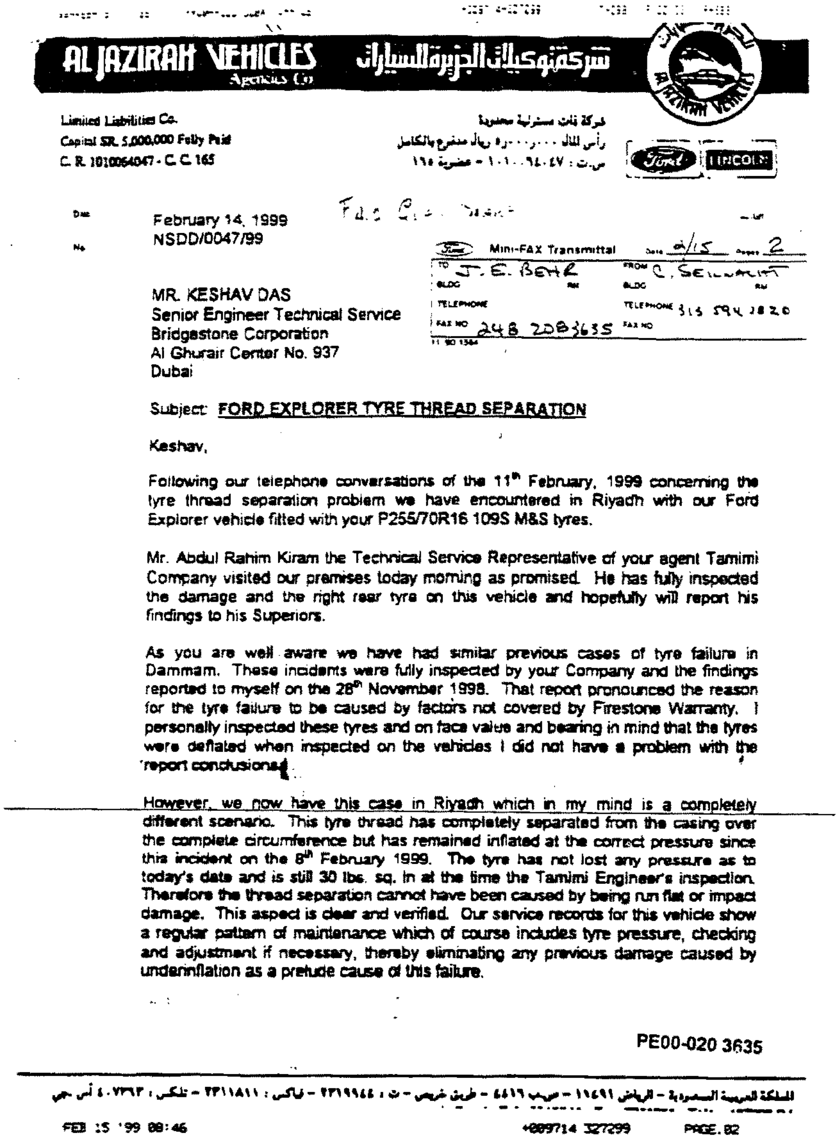
FROM: MELANIE GUMZ   USAET(UTC -05:00)
Subject: RE: Explorer Firestone issue

DM TO MG 1/17/99

I talked to John Behr from Firestone, and he is going to supply me with a Firestone recommended procedure on Friday.

MG TO DM 1/22/99
MG TO MK 1/25/99
MK TO MG 1/26/99

John assured me he would be happy to review all the cases you have experienced, but he agrees the information I've requested below has to be supplied in order to have a meaningful discussion. If you can get



AL JAZIRAH VEHICLES Agencies Co
شركة توكيلات الجزيرة للسيارات

Limited Liabilities Co.
Capital SR. 5,000,000 Fully Paid
C. R. 1010064047 - C. C. 165

شركة ذات مسئولية محدودة
رأس المال ٥٠٠٠٠٠٠ ريال مدفوع بالكامل
س.ت : ١٠١٠٠٦٤٠٤٧ – عضوية ١٦٥

Date February 14, 1999 Fax [illegible]

No. NSDD/0047/99

Mini-FAX Transmittal Date 2/15 Pages 2
To J. E. BEHR From C. SEILWART
Telephone 313 594 2820
Fax No 248 2083635

MR. KESHAV DAS
Senior Engineer Technical Service
Bridgestone Corporation
Al Ghurair Center No. 937
Dubai

Subject: FORD EXPLORER TYRE THREAD SEPARATION

Keshav,

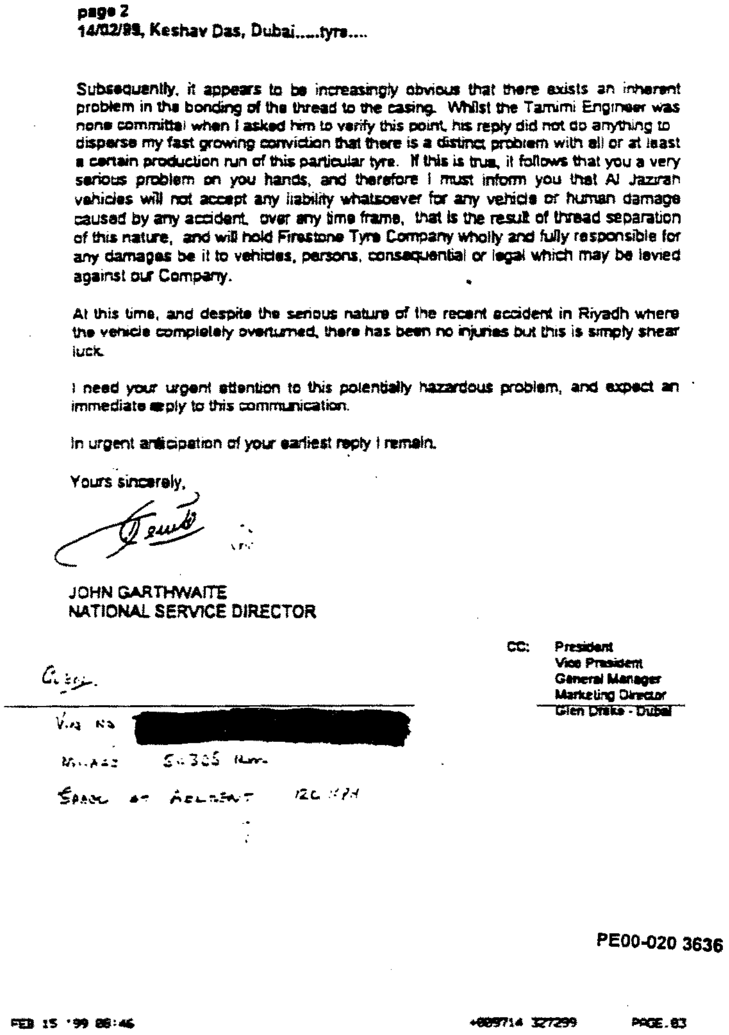
Following our telephone conversations of the 11th February, 1999 concerning the tyre thread separation problem we have encountered in Riyadh with our Ford Explorer vehicle fitted with your P255/70R16 109S M&S tyres.

Mr. Abdul Rahim Kiram the Technical Service Representative of your agent Tamimi Company visited our premises today morning as promised. He has fully inspected the damage and the right rear tyre on this vehicle and hopefully will report his findings to his Superiors.

As you are well aware we have had similar previous cases of tyre failure in Dammam. These incidents were fully inspected by your Company and the findings reported to myself on the 28th November 1998. That report pronounced the reason for the tyre failure to be caused by factors not covered by Firestone Warranty. I personally inspected these tyres and on face value and bearing in mind that the tyres were deflated when inspected on the vehicles I did not have a problem with the report conclusions.

However, we now have this case in Riyadh which in my mind is a completely different scenario. This tyre thread has completely separated from the casing over the complete circumference but has remained inflated at the correct pressure since this incident on the 8th February 1999. The tyre has not lost any pressure as to today's date and is still 30 lbs. sq. in at the time the Tamimi Engineer's inspection. Therefore the thread separation cannot have been caused by being run flat or impact damage. This aspect is clear and verified. Our service records for this vehicle show a regular pattern of maintenance which of course includes tyre pressure, checking and adjustment if necessary, thereby eliminating any previous damage caused by underinflation as a prelude cause of this failure.

المملكة العربية السعودية – الرياض ١١٦٩١ – ص.ب ٦٦١٦ – طريق خريص – ت : ٢٣١٩٩٤٤ – فاكس : ٢٣١١٨١١ – تلكس : ٤٠٧٣٦٣



page 2
14/02/99, Keshav Das, Dubai.....tyre....

Subsequently, it appears to be increasingly obvious that there exists an inherent problem in the bonding of the thread to the casing. Whilst the Tamimi Engineer was none committal when I asked him to verify this point, his reply did not do anything to disperse my fast growing conviction that there is a distinct problem with all or at least a certain production run of this particular tyre. If this is true, it follows that you a very serious problem on you hands, and therefore I must inform you that Al Jazirah vehicles will not accept any liability whatsoever for any vehicle or human damage caused by any accident, over any time frame, that is the result of thread separation of this nature, and will hold Firestone Tyre Company wholly and fully responsible for any damages be it to vehicles, persons, consequential or legal which may be levied against our Company.

At this time, and despite the serious nature of the recent accident in Riyadh where the vehicle completely overturned, there has been no injuries but this is simply shear luck.

I need your urgent attention to this potentially hazardous problem, and expect an immediate reply to this communication.

In urgent anticipation of your earliest reply I remain.

Yours sincerely,

JOHN GARTHWAITE
NATIONAL SERVICE DIRECTOR

CC: President
Vice President
General Manager
Marketing Director
Glen Drake - Dubai

Greg.

VIN NO [redacted]

MILEAGE 54,305 KM

SPEED AT ACCIDENT 120 KPH

BRIDGESTONE Firestone

ORIGINAL EQUIPMENT TIRE SALES COMPANY
One Towne Square, Suite 1470
Southfield, MI 48076-3705
Phone: 248-208-3600 Fax: 248-208-3635

A DIVISION OF BRIDGESTONE/FIRESTONE, INC

March 11, 1999

Mr. Chuck Seilnacht
Ford Motor Company
Customer Service Office
Worldwide Direct Market Operations
Fairlane Business Park III
1555 Fairlane Drive, Room 146
Allen Park, MI 48101

Dear Chuck,

Subject: **P255/70R16 A/T TIRE FOR THE EXPLORER**

As you requested, I've asked our people for confirmation as to the acceptability of the subject tire's performance in the U.S.

We began producing this tire back in 1995, and for the four year period through 1998 we've manufactured and sold just under 1.75 million of these tires. To date, our total adjustment (i.e. warranty) rate for this tire is less than 0.1% (1/10th of 1%). That return rate encompasses all reasons, including workmanship and materials, shake & vibration, road hazard (where applicable), etc.

Obviously, that return rate is extremely low, and substantiates our belief that this tire performs exceptionally well in the U.S. market.

Yours truly,

John E. Behr
Account Executive

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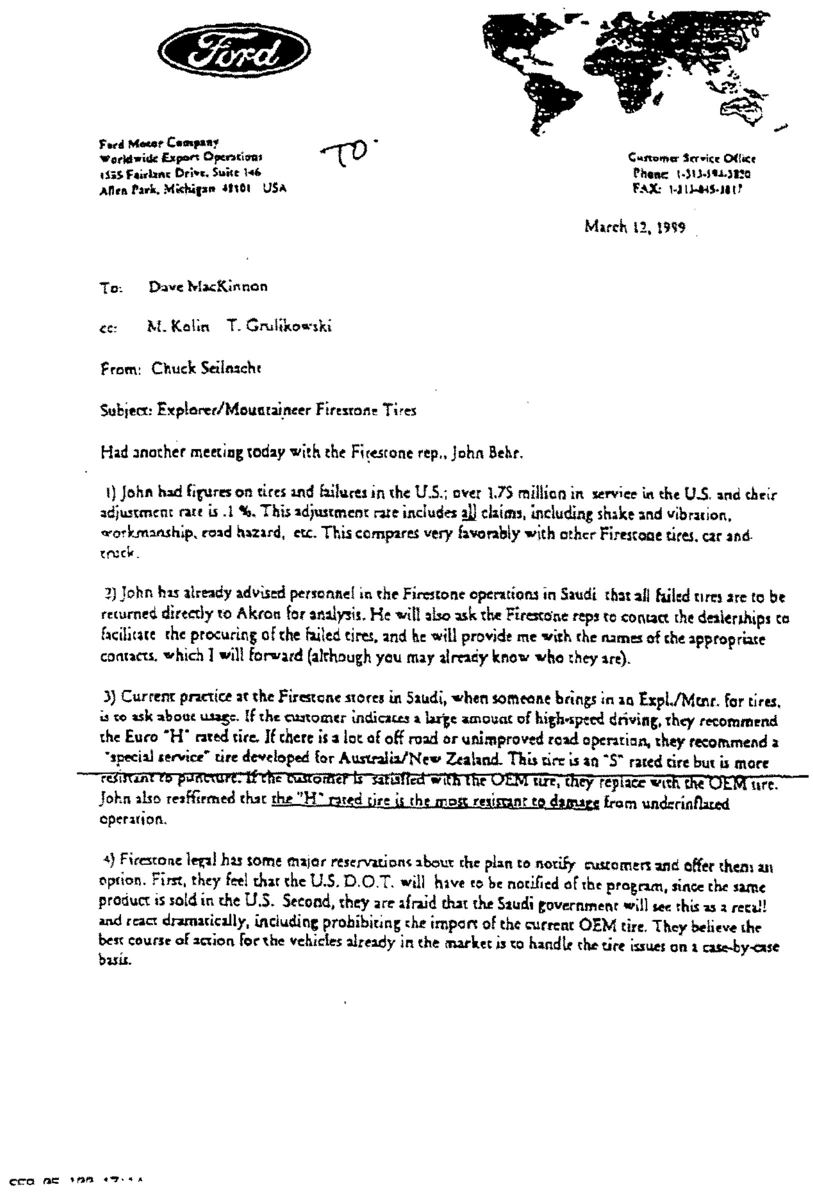
letter-b.doc



Ford Motor Company
Worldwide Export Operations
1555 Fairlane Drive, Suite 146
Allen Park, Michigan 48101 USA

TO·

Customer Service Office
Phone: 1-313-594-3820
FAX: 1-313-845-3817

March 12, 1999

To: Dave MacKinnon

cc: M. Kolin T. Grulikowski

From: Chuck Seilnacht

Subject: Explorer/Mountaineer Firestone Tires

Had another meeting today with the Firestone rep., John Behr.

1) John had figures on tires and failures in the U.S.; over 1.75 million in service in the U.S. and their adjustment rate is .1 %. This adjustment rate includes all claims, including shake and vibration, workmanship, road hazard, etc. This compares very favorably with other Firestone tires, car and truck.

2) John has already advised personnel in the Firestone operations in Saudi that all failed tires are to be returned directly to Akron for analysis. He will also ask the Firestone reps to contact the dealerships to facilitate the procuring of the failed tires, and he will provide me with the names of the appropriate contacts, which I will forward (although you may already know who they are).

3) Current practice at the Firestone stores in Saudi, when someone brings in an Expl./Mtnr. for tires, is to ask about usage. If the customer indicates a large amount of high-speed driving, they recommend the Euro "H" rated tire. If there is a lot of off road or unimproved road operation, they recommend a "special service" tire developed for Australia/New Zealand. This tire is an "S" rated tire but is more resistant to puncture. If the customer is satisfied with the OEM tire, they replace with the OEM tire. John also reaffirmed that the "H" rated tire is the most resistant to damage from underinflated operation.

4) Firestone legal has some major reservations about the plan to notify customers and offer them an option. First, they feel that the U.S. D.O.T. will have to be notified of the program, since the same product is sold in the U.S. Second, they are afraid that the Saudi government will see this as a recall! and react dramatically, including prohibiting the import of the current OEM tire. They believe the best course of action for the vehicles already in the market is to handle the tire issues on a case-by-case basis.

Related to the Firestone legal concerns is the possibility that we will be expanding the owner relations issue. The owners who receive the notification letter may see the program as a recall and not be willing to pay anything to upgrade the tires. So, instead of 8 owner relations issues, we now have X times as many.

I tt Corey MacGillivray in the OGC last Monday about the proposal. He didn't think that working on a case-by-case basis with the owners of the damaged vehicles presented a problem, but he was concerned about the implications of the owner letter (similar to the Firestone concerns). He was going to check with one of his colleagues to get more info. Unfortunately, Corey went to China before he could get back with me. He did reply to my PROFS note of 10 March, and asked one of his colleagues in OGC to help us.

The implication of this conversation seems to be that most of the elements of the current proposal (current production and 2000 MY to "H" tires; address damaged units on a case-by-case basis; all suspect tires shipped to Akron) EXCEPT the owner letter are still applicable.

I will follow up with OGC (Corey or one of his colleagues) to get a definitive answer on the customer letters and advise.

(It's interesting to note that there is no reference to this issue in the 9 March communication from Abdullah F. Al-Kraidees that raised Khalid Al-Shubaily's issues from the conference.)

Privileged & Confidential

SUBJECT:

Firestone Tire Tread Separations

BACKGROUND:

Eight Explorer/Mountaineer rollovers in Saudi Arabia have allegedly been caused by tire failures when the vehicle was being driven on the highway. Four of the vehicles are Explorers from Al Jazirah. The other vehicles are Mountaineers from Haji Hussein Alireza. All vehicles are equipped with Firestone P255/70R16 SL all-terrain tires.

Some of the Explorer tires were inspected at Al Jazirah by a representative of the local distributor (Tamimi) and found to have improper repairs and had been damaged by operation in an underinflated condition. Firestone assumed no responsibility.

One tire from one of the Mountaineers was inspected at HHA by a representative of the local Firestone distributor. The inspection report indicates that this tire was also improperly repaired. Firestone assumed no responsibility.

One set of the Explorer tires was sent by the local Firestone distributor to the Firestone facilities in Akron, Ohio for inspection. The inspection report from Akron indicates that two of the tires were improperly repaired, and one was damaged by operation in an underinflated condition. Firestone assumed no responsibility.

KEY INFORMATION:

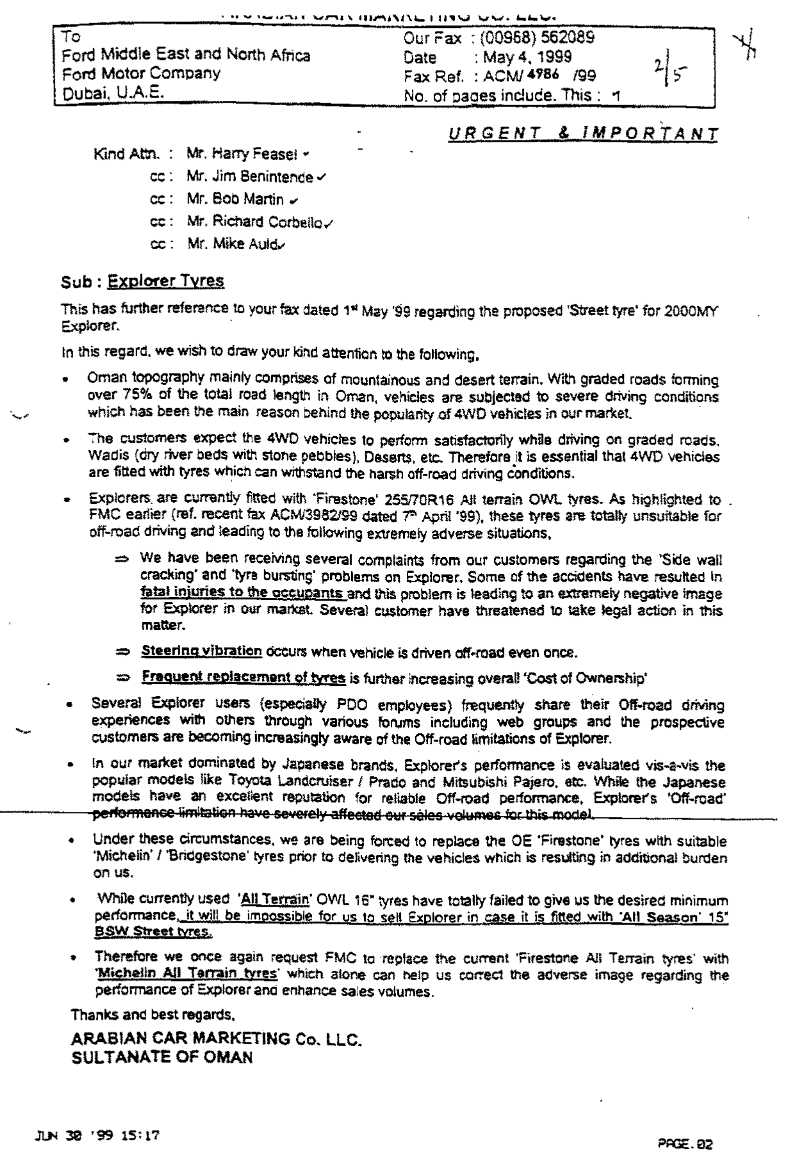
- Approximately one and one-half million of these same all-terrain tires are in use on U.S. Explorers/Mountaineers.
- Only 4-6 reports alleging somewhat similar tire failure are in the Corporate product concern database (CQIS).
- Firestone Corporate representatives are not aware of any problems with the tire in the U.S. market.
- Approximately 6000 '95-'99 Explorers and Mountaineers in operation in the GCC; approximately 2000 in Saudi Arabia alone. No rollovers related to tire failure have been reported in the other GCC countries.
- Anecdotal information from Saudi Arabia indicates that the practice of lowering the tire pressure before operating the vehicle off-road and then reinflating the tires later is not an uncommon practice.
- Tire is speed rated at 112 mph; Exp./Mtnr. speed limited to 107.
- Tire warranty is expressly not a Ford responsibility.

CONCLUSION:

There is no evidence to indicate that undamaged P255/70R16SL tires are unsuitable for the market, or present any ~~extraordinary risk under normal operating conditions to vehicle operators or passengers. However, it would be~~ prudent to take actions in Saudi Arabia to increase the tire safety margin and address the dealer and owner relations issues

ACTIONS:

1) Testing is underway to confirm the suitability of the "Special Service" all-terrain tire developed for Australia for the GCC. This tire provides some extra margin against punctures, which may reduce the incidence of improper repairs.
2) All available tires alleged to have failed will be shipped to Akron for inspection by Firestone. A detailed report of the results of the inspection forwarded to the dealership and to the CSO Product Concern Supervisor (copy to be provided to Regional personnel).
3) Initiate a dealer communication program emphasizing the importance of proper tire usage and maintenance.
4) Address the issues related to the roll-overs on a case-by-case basis.



To
Ford Middle East and North Africa
Ford Motor Company
Dubai, U.A.E.

Our Fax : (00968) 562089
Date : May 4, 1999
Fax Ref. : ACM/ 4986 /99
No. of pages include. This : 1

2/5

URGENT & IMPORTANT

Kind Attn. : Mr. Harry Feasel
cc : Mr. Jim Benintende ✓
cc : Mr. Bob Martin ✓
cc : Mr. Richard Corbello ✓
cc : Mr. Mike Auld ✓

Sub : Explorer Tyres

This has further reference to your fax dated 1st May '99 regarding the proposed 'Street tyre' for 2000MY Explorer.

In this regard, we wish to draw your kind attention to the following,

- Oman topography mainly comprises of mountainous and desert terrain. With graded roads forming over 75% of the total road length in Oman, vehicles are subjected to severe driving conditions which has been the main reason behind the popularity of 4WD vehicles in our market.
- The customers expect the 4WD vehicles to perform satisfactorily while driving on graded roads, Wadis (dry river beds with stone pebbles), Deserts, etc. Therefore it is essential that 4WD vehicles are fitted with tyres which can withstand the harsh off-road driving conditions.
- Explorers are currently fitted with 'Firestone' 255/70R16 All terrain OWL tyres. As highlighted to FMC earlier (ref. recent fax ACM/3982/99 dated 7th April '99), these tyres are totally unsuitable for off-road driving and leading to the following extremely adverse situations,
    - ⇒ We have been receiving several complaints from our customers regarding the 'Side wall cracking' and 'tyre bursting' problems on Explorer. Some of the accidents have resulted in **fatal injuries to the occupants** and this problem is leading to an extremely negative image for Explorer in our market. Several customer have threatened to take legal action in this matter.
    - ⇒ **Steering vibration** occurs when vehicle is driven off-road even once.
    - ⇒ **Frequent replacement of tyres** is further increasing overall 'Cost of Ownership'
- Several Explorer users (especially PDO employees) frequently share their Off-road driving experiences with others through various forums including web groups and the prospective customers are becoming increasingly aware of the Off-road limitations of Explorer.
- In our market dominated by Japanese brands, Explorer's performance is evaluated vis-a-vis the popular models like Toyota Landcruiser / Prado and Mitsubishi Pajero, etc. While the Japanese models have an excellent reputation for reliable Off-road performance, Explorer's 'Off-road' performance limitation have severely affected our sales volumes for this model.
- Under these circumstances, we are being forced to replace the OE 'Firestone' tyres with suitable 'Michelin' / 'Bridgestone' tyres prior to delivering the vehicles which is resulting in additional burden on us.
- While currently used '**All Terrain**' OWL 16" tyres have totally failed to give us the desired minimum performance, **it will be impossible for us to sell Explorer in case it is fitted with 'All Season' 15" BSW Street tyres.**
- Therefore we once again request FMC to replace the current 'Firestone All Terrain tyres' with '**Michelin All Terrain tyres**' which alone can help us correct the adverse image regarding the performance of Explorer and enhance sales volumes.

Thanks and best regards,

ARABIAN CAR MARKETING Co. LLC.
SULTANATE OF OMAN

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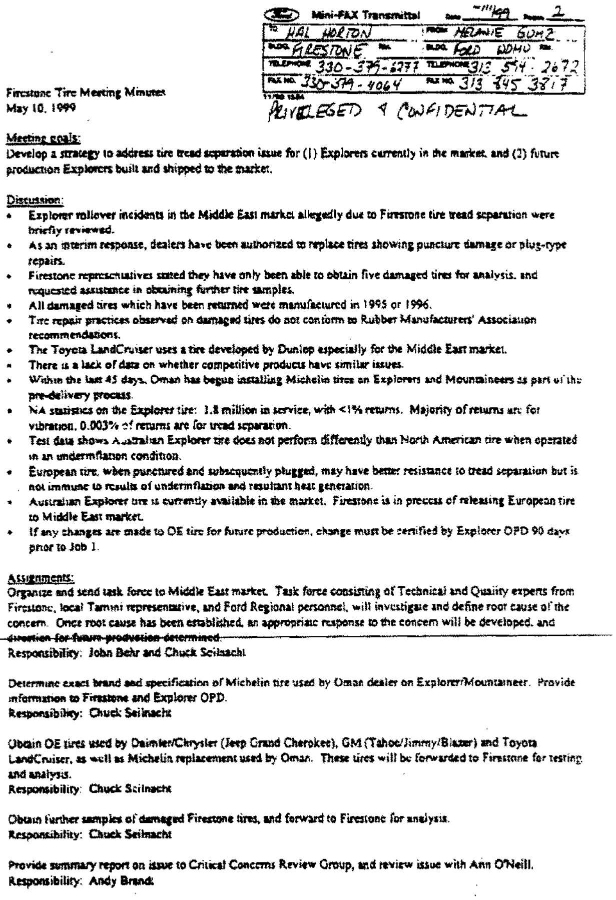


Mini-FAX Transmittal Date -/11/99 Pages 2

To HAL HORTON	From MELANIE GOMZ
Bldg. FIRESTONE	Bldg. FORD WDHQ
Telephone 330-379-6277	Telephone 313 594 2672
Fax No. 330-379-4064	Fax No. 313 845 3817

PRIVELEGED & CONFIDENTIAL

Firestone Tire Meeting Minutes
May 10, 1999

Meeting goals:
Develop a strategy to address tire tread separation issue for (1) Explorers currently in the market, and (2) future production Explorers built and shipped to the market.

Discussion:

- Explorer rollover incidents in the Middle East market allegedly due to Firestone tire tread separation were briefly reviewed.
- As an interim response, dealers have been authorized to replace tires showing puncture damage or plug-type repairs.
- Firestone representatives stated they have only been able to obtain five damaged tires for analysis, and requested assistance in obtaining further tire samples.
- All damaged tires which have been returned were manufactured in 1995 or 1996.
- Tire repair practices observed on damaged tires do not conform to Rubber Manufacturers' Association recommendations.
- The Toyota LandCruiser uses a tire developed by Dunlop especially for the Middle East market.
- There is a lack of data on whether competitive products have similar issues.
- Within the last 45 days, Oman has begun installing Michelin tires on Explorers and Mountaineers as part of the pre-delivery process.
- NA statistics on the Explorer tire: 1.8 million in service, with <1% returns. Majority of returns are for vibration, 0.003% of returns are for tread separation.
- Test data shows Australian Explorer tire does not perform differently than North American tire when operated in an underinflation condition.
- European tire, when punctured and subsequently plugged, may have better resistance to tread separation but is not immune to results of underinflation and resultant heat generation.
- Australian Explorer tire is currently available in the market. Firestone is in process of releasing European tire to Middle East market.
- If any changes are made to OE tire for future production, change must be certified by Explorer OPD 90 days prior to Job 1.

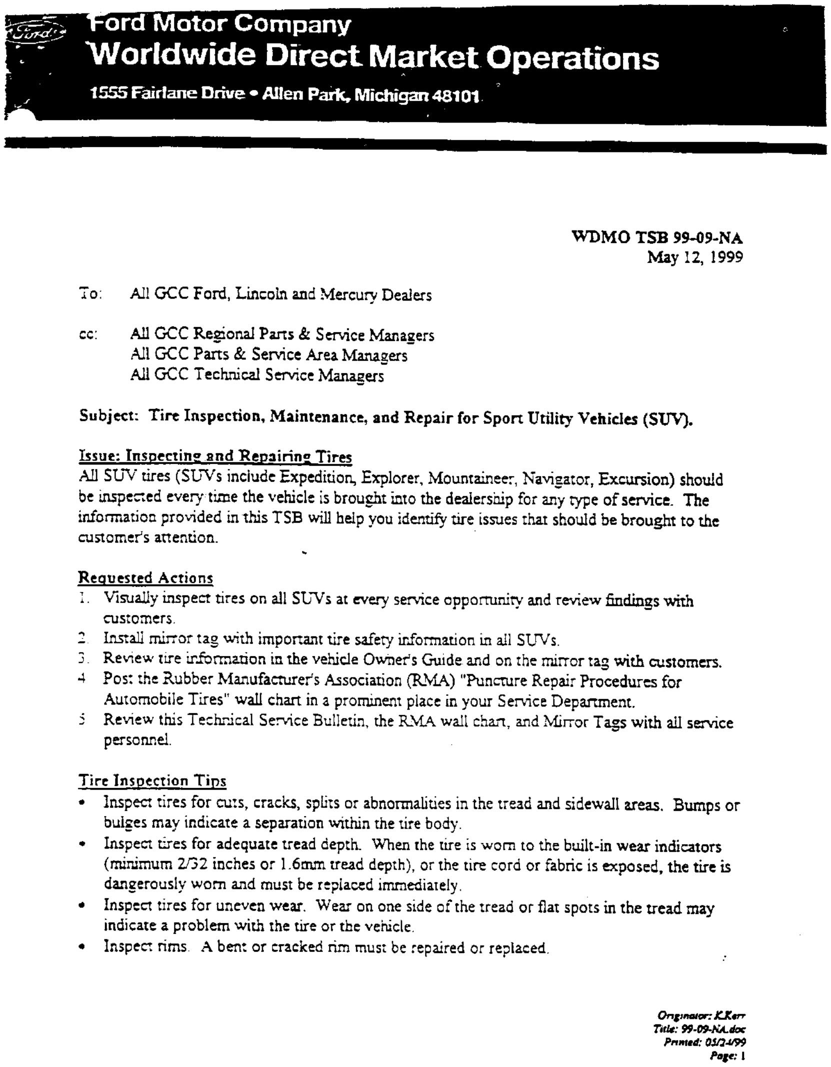
Assignments:
Organize and send task force to Middle East market. Task force consisting of Technical and Quality experts from Firestone, local Tamini representative, and Ford Regional personnel, will investigate and define root cause of the concern. Once root cause has been established, an appropriate response to the concern will be developed, and ~~direction for future production determined.~~
Responsibility: John Behr and Chuck Seilnacht

Determine exact brand and specification of Michelin tire used by Oman dealer on Explorer/Mountaineer. Provide information to Firestone and Explorer OPD.
Responsibility: Chuck Seilnacht

Obtain OE tires used by Daimler/Chrysler (Jeep Grand Cherokee), GM (Tahoe/Jimmy/Blazer) and Toyota LandCruiser, as well as Michelin replacement used by Oman. These tires will be forwarded to Firestone for testing and analysis.
Responsibility: Chuck Seilnacht

Obtain further samples of damaged Firestone tires, and forward to Firestone for analysis.
Responsibility: Chuck Seilnacht

Provide summary report on issue to Critical Concerns Review Group, and review issue with Ann O'Neill.
Responsibility: Andy Brandt



Ford Motor Company
Worldwide Direct Market Operations
1555 Fairlane Drive • Allen Park, Michigan 48101

WDMO TSB 99-09-NA
May 12, 1999

To: All GCC Ford, Lincoln and Mercury Dealers

cc: All GCC Regional Parts & Service Managers
All GCC Parts & Service Area Managers
All GCC Technical Service Managers

Subject: Tire Inspection, Maintenance, and Repair for Sport Utility Vehicles (SUV).

Issue: Inspecting and Repairing Tires

All SUV tires (SUVs include Expedition, Explorer, Mountaineer, Navigator, Excursion) should be inspected every time the vehicle is brought into the dealership for any type of service. The information provided in this TSB will help you identify tire issues that should be brought to the customer's attention.

Requested Actions

1. Visually inspect tires on all SUVs at every service opportunity and review findings with customers.
2. Install mirror tag with important tire safety information in all SUVs.
3. Review tire information in the vehicle Owner's Guide and on the mirror tag with customers.
4. Post the Rubber Manufacturer's Association (RMA) "Puncture Repair Procedures for Automobile Tires" wall chart in a prominent place in your Service Department.
5. Review this Technical Service Bulletin, the RMA wall chart, and Mirror Tags with all service personnel.

Tire Inspection Tips

- Inspect tires for cuts, cracks, splits or abnormalities in the tread and sidewall areas. Bumps or bulges may indicate a separation within the tire body.
- Inspect tires for adequate tread depth. When the tire is worn to the built-in wear indicators (minimum 2/32 inches or 1.6mm tread depth), or the tire cord or fabric is exposed, the tire is dangerously worn and must be replaced immediately.
- Inspect tires for uneven wear. Wear on one side of the tread or flat spots in the tread may indicate a problem with the tire or the vehicle.
- Inspect rims. A bent or cracked rim must be repaired or replaced.

Originator: K.Kerr
Title: 99-09-NA.doc
Printed: 05/24/99
Page: 1

Tire Repair Guidelines

Inspect tires for signs of improper repairs. Tire repairs should only be performed in accordance with the following guidelines. If there is any question regarding the method that was used on an existing repair, ask the customer for further information regarding the repair.

- Never repair a tire with less than 2/32 inches (1.6mm) tread depth. The tire is worn out and must be properly discarded.
- Never repair a tire with a puncture larger than ¼ inch (6.4mm) in diameter. Punctures larger than this cannot be properly repaired and the tire must be replaced.
- Repairs of all tires (radial and non-radial) must utilize a rubber plug and an internal patch or a combination patch-plug. **Using plugs alone on any type of tire is not a safe tire repair.** Cord or fiber plugs do not conform to the RMA recommendations and should never be used.
- Never repair a tire with a puncture or other damage outside the tread area. Damage outside the tread area cannot be properly repaired and the tire must be replaced.
- All tire repairs require separation of the tire from the rim by de-mounting the tire. Any tire repair done without removing the tire from the rim is an improper repair.
- Tires should be repaired only by a qualified tire service person.
- Never use a tire tube as a substitute for a proper tire repair.

SAFETY WARNING!!!

A tire's speed rating is void if the tire is repaired, re-treaded, damaged, abused, or otherwise altered from its original condition. Thereafter, it should be treated as a non-speed-rated tire and should be used accordingly.

Mirror Tags for Increasing Customer Awareness of Tire Safety

Mirror tags with important safety information will be sent directly to your dealership. You should receive the mirror tags by the end of June, 1999. This tag should be hung from the mirror of any SUV which is brought in for service. If you do not receive your initial shipment of tags, please contact your Regional Office. Additional mirror tags will be available through the Literature Order Guide.

Rubber Manufacturers' Association (RMA) Wall Chart

Along with your shipment of mirror tags, you will be receiving a wall chart published by the RMA titled, "Puncture Repair Procedures for Automobile Tires". Post this wall chart in a prominent place in the Service Department for easy reference.

Technical Support
Customer Service Office

TIRE DAMAGE

SAFETY WARNING

Driving on damaged tires is dangerous. A damaged tire can suddenly fail causing serious personal injury or death. Have your tires regularly inspected by your dealer or tire retailer for damage.

TIPS FOR SPOTTING DAMAGED TIRES

- After striking anything unusual in the roadway, ask your dealer or tire retailer to demount the tire and inspect it for damage. A tire may not have visible signs of damage on the tire surface. Yet, the tire may suddenly fail without warning a day, a week or even months later.
- Inspect your tires for cuts, cracks, splits or bruises in the tread and sidewall areas. Bumps or bulges may indicate a separation within the tire body. Have your tire inspected by a qualified tire service person. It may be necessary to have it removed from the wheel for a complete inspection.
- Inspect your tires for adequate tread depth. When the tire is worn to the built-in indicators at 2/32nd inch (1.6 millimeters) or less tread groove depth, or the tire cord or fabric is exposed, the tire is dangerously worn and must be replaced immediately.
- Inspect your tires for uneven wear. Wear on one side of the tread or flat spots in the tread may indicate a problem with the tire or vehicle. Consult your dealer or tire retailer.
- Inspect your rims also. If you have a bent or cracked rim, it must be replaced.

TIRE REPAIRS

SAFETY WARNING

Driving on an improperly repaired tire is dangerous. An improper repair can cause further damage to the tire. It may suddenly fail, causing serious personal injury or death. To be safe, go to your dealer or tire retailer for proper tire repairs.

SAFETY WARNING

Before having a tire repaired, tell the dealer or tire retailer if you have used an aerosol fixer to inflate/seal the tire. Aerosol fixers could contain a highly volatile gas. Always remove the valve core outdoors, away from sources of excessive heat, flame or sparks and completely deflate the tire before removing it from the rim for repair.

- Never repair a tire with less than 2/32nd inch (1.6 millimeters) tread remaining. At this tread depth, the tire is worn out and must be replaced.
- Never repair a tire with a puncture larger than 1/4 inch (6.4 millimeters) in diameter. Such tires cannot be properly repaired and must be replaced.
- Repairs of all tires (radial and non-radial) must be of the plug and inside patch type unless the hole is too small to insert a plug. **Using plugs alone on any type of tire is not a safe repair.**
- Never repair a tire with a puncture or other damage outside the tread area. Such tires cannot be properly repaired and must be replaced.
- Any tire repair done without removing the tire from the rim is improper.
- Tubes, like tires, should be repaired only by a qualified tire service person.
- Never use a tube as a substitute for a proper repair.

SAFETY WARNING

A tire's speed rating is void if the tire is repaired, retreaded, damaged or abused or otherwise altered from its original condition. Thereafter, it should be treated as a non-speed-rated tire.

STATEMENT – FOR USE ON INQUIRY

Contact: Jon Harmon
(313) 845-5745

Response to published comments on the Firestone tread separation issue attributed to INDECU (Venezuelan Consumer Defense Institute):

The following statement is attributable to Helen Petrauskas, Ford vice president – Environmental and Safety Engineering:

We have met with INDECU and will continue to meet with this consumer protection agency in Venezuela to ensure the agency has a complete and correct understanding of the Firestone tire tread separation issue. It is absolutely incorrect to assert that the design of the Explorer is contributing, in any way, to this serious safety problem. We have made stiffer shock absorbers available to our customers in Venezuela to address ride quality complaints related to washboard road surfaces.

These are two completely separate issues: the tread separation safety concern, which Ford has addressed beginning in May with the announcement of our tire replacement program for all owners of Ford vehicles with Firestone tires; and a customer satisfaction issue related to high speed driving on rough road surfaces.

Also, the suggestion that Ford promised to lower the electronically-governed top speed of the Ford Explorer to match the speed rating of some of Firestone tires, is incorrect. We have no knowledge of Firestone requesting a lower top speed for the vehicle. Firestone was contracted to supply tires with a speed rating appropriate for the vehicle's electronically governed top speed.

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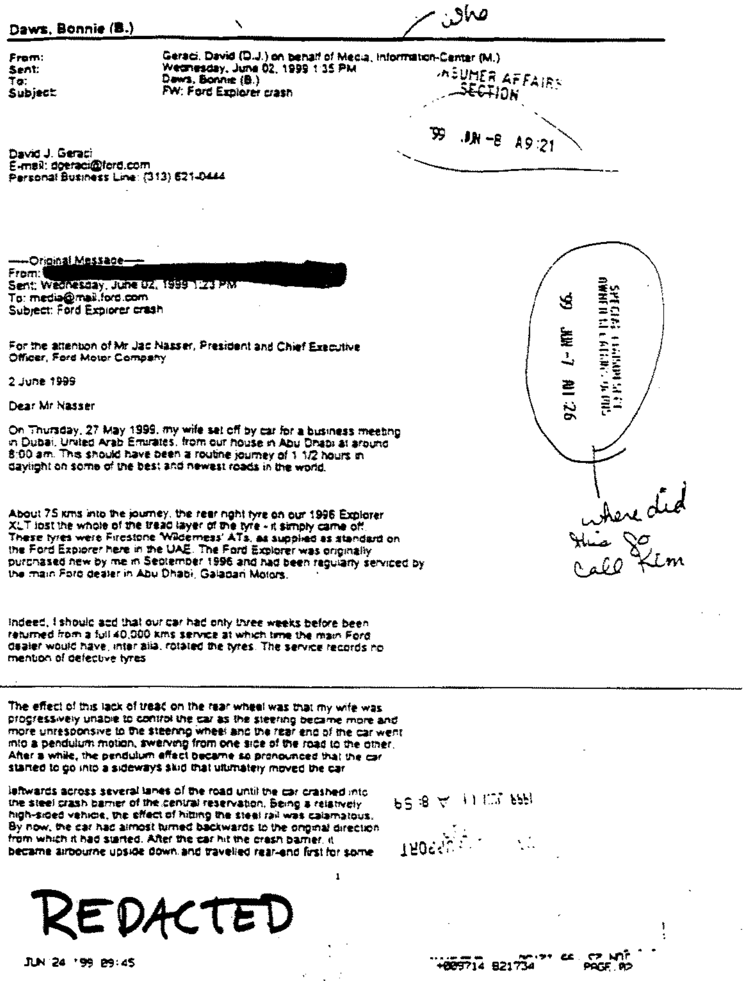

who

Daws, Bonnie (B.)

From: Geraci, David (D.J.) on behalf of Media, Information-Center (M.)
Sent: Wednesday, June 02, 1999 1:35 PM
To: Daws, Bonnie (B.)
Subject: FW: Ford Explorer crash

...SUMER AFFAIRS SECTION
'99 JUN -8 A9:21

David J. Geraci
E-mail: dgeraci@ford.com
Personal Business Line: (313) 621-0444

-----Original Message-----
From: [redacted]
Sent: Wednesday, June 02, 1999 1:23 PM
To: media@mail.ford.com
Subject: Ford Explorer crash

'99 JUN -7 AII:26

For the attention of Mr Jac Nasser, President and Chief Executive Officer, Ford Motor Company

2 June 1999

Dear Mr Nasser

On Thursday, 27 May 1999, my wife set off by car for a business meeting in Dubai, United Arab Emirates, from our house in Abu Dhabi at around 8:00 am. This should have been a routine journey of 1 1/2 hours in daylight on some of the best and newest roads in the world.

About 75 kms into the journey, the rear right tyre on our 1996 Explorer XLT lost the whole of the tread layer of the tyre - it simply came off. These tyres were Firestone 'Wilderness' ATs, as supplied as standard on the Ford Explorer here in the UAE. The Ford Explorer was originally purchased new by me in September 1996 and had been regularly serviced by the main Ford dealer in Abu Dhabi, Galadari Motors.

where did this go
call Kim

Indeed, I should add that our car had only three weeks before been returned from a full 40,000 kms service at which time the main Ford dealer would have, inter alia, rotated the tyres. The service records no mention of defective tyres

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The effect of this lack of tread on the rear wheel was that my wife was progressively unable to control the car as the steering became more and more unresponsive to the steering wheel and the rear end of the car went into a pendulum motion, swerving from one side of the road to the other. After a while, the pendulum effect became so pronounced that the car started to go into a sideways skid that ultimately moved the car

leftwards across several lanes of the road until the car crashed into the steel crash barrier of the central reservation. Being a relatively high-sided vehicle, the effect of hitting the steel rail was calamatous. By now, the car had almost turned backwards to the original direction from which it had started. After the car hit the crash barrier, it became airbourne upside down and travelled rear-end first for some

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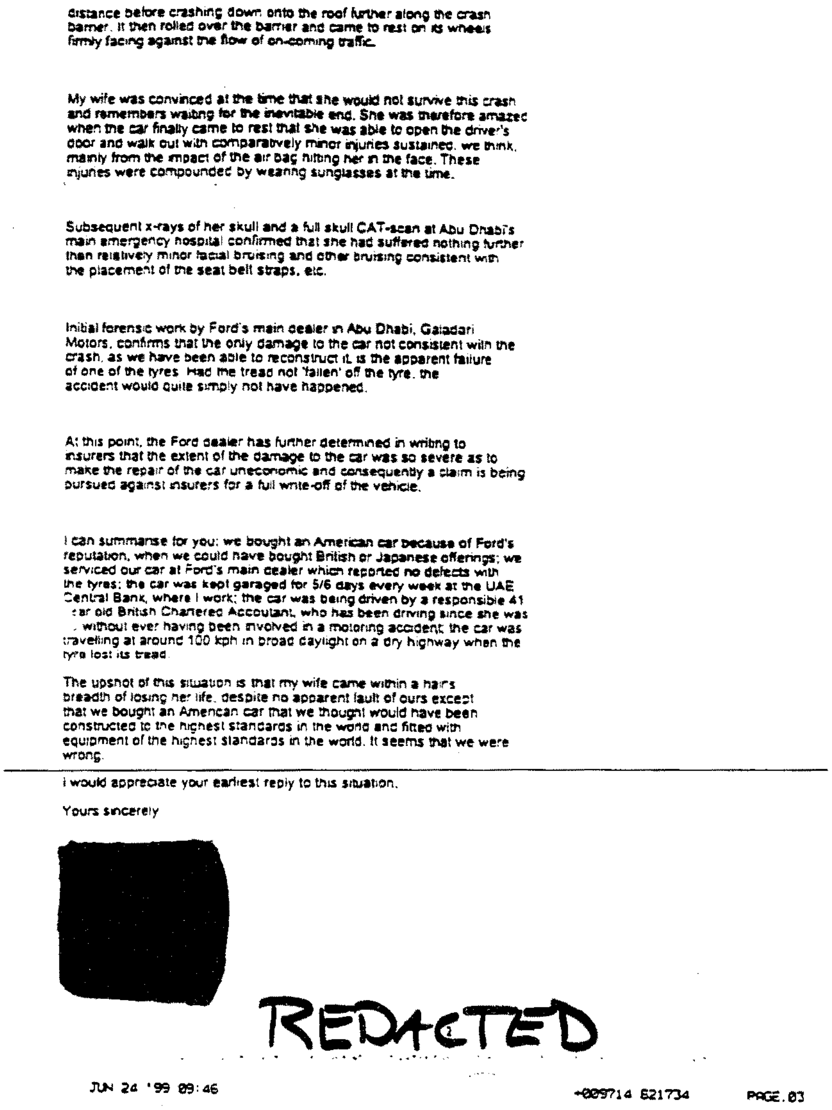

distance before crashing down onto the roof further along the crash barrier. It then rolled over the barrier and came to rest on its wheels firmly facing against the flow of on-coming traffic.

My wife was convinced at the time that she would not survive this crash and remembers waiting for the inevitable end. She was therefore amazed when the car finally came to rest that she was able to open the driver's door and walk out with comparatively minor injuries sustained, we think, mainly from the impact of the air bag hitting her in the face. These injuries were compounded by wearing sunglasses at the time.

Subsequent x-rays of her skull and a full skull CAT-scan at Abu Dhabi's main emergency hospital confirmed that she had suffered nothing further than relatively minor facial bruising and other bruising consistent with the placement of the seat belt straps, etc.

Initial forensic work by Ford's main dealer in Abu Dhabi, Galadari Motors, confirms that the only damage to the car not consistent with the crash, as we have been able to reconstruct it, is the apparent failure of one of the tyres. Had the tread not 'fallen' off the tyre, the accident would quite simply not have happened.

At this point, the Ford dealer has further determined in writing to insurers that the extent of the damage to the car was so severe as to make the repair of the car uneconomic and consequently a claim is being pursued against insurers for a full write-off of the vehicle.

I can summarise for you: we bought an American car because of Ford's reputation, when we could have bought British or Japanese offerings; we serviced our car at Ford's main dealer which reported no defects with the tyres; the car was kept garaged for 5/6 days every week at the UAE Central Bank, where I work; the car was being driven by a responsible 41 ear old British Chartered Accoutant, who has been driving since she was . without ever having been involved in a motoring accident; the car was travelling at around 100 kph in broad daylight on a dry highway when the tyre lost its tread.

The upshot of this situation is that my wife came within a hair's breadth of losing her life, despite no apparent fault of ours except that we bought an American car that we thought would have been constructed to the highest standards in the world and fitted with equipment of the highest standards in the world. It seems that we were wrong.

I would appreciate your earliest reply to this situation.

Yours sincerely

[redacted]

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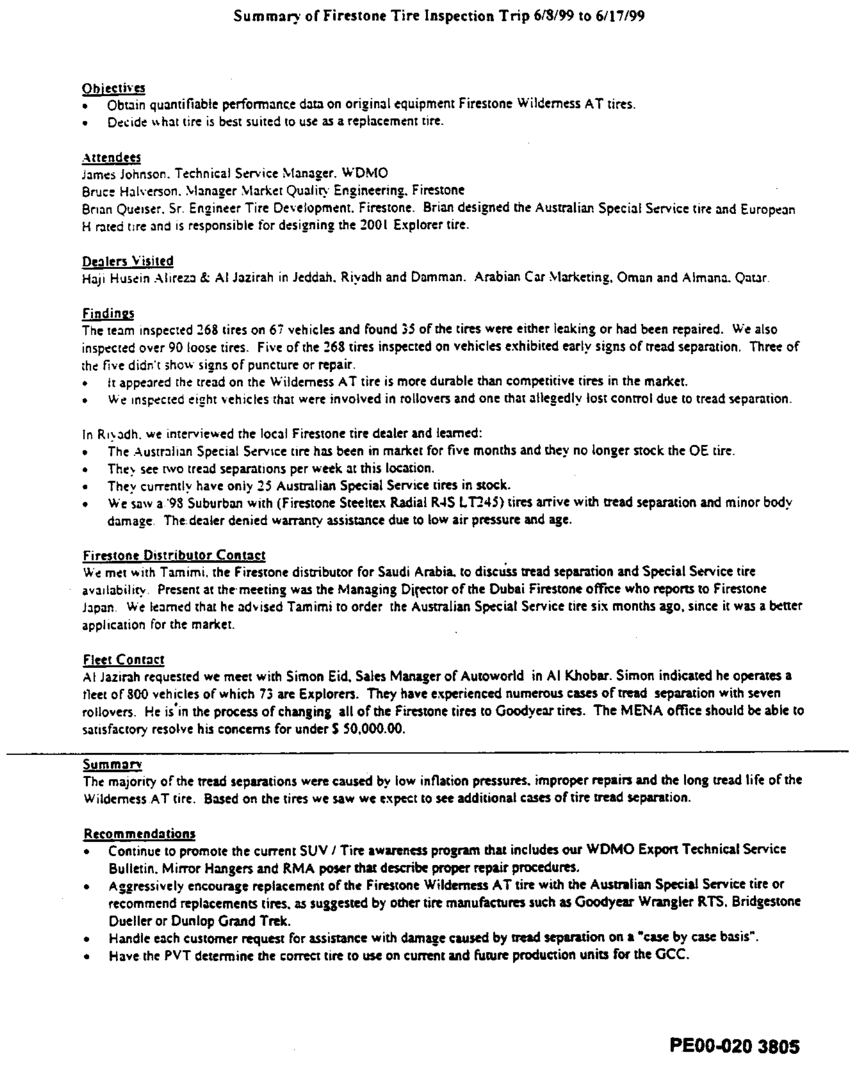


Summary of Firestone Tire Inspection Trip 6/8/99 to 6/17/99

Objectives

- Obtain quantifiable performance data on original equipment Firestone Wilderness AT tires.
- Decide what tire is best suited to use as a replacement tire.

Attendees

James Johnson, Technical Service Manager, WDMO
Bruce Halverson, Manager Market Quality Engineering, Firestone
Brian Queiser, Sr. Engineer Tire Development, Firestone. Brian designed the Australian Special Service tire and European H rated tire and is responsible for designing the 2001 Explorer tire.

Dealers Visited

Haji Husein Alireza & Al Jazirah in Jeddah, Riyadh and Damman. Arabian Car Marketing, Oman and Almana, Qatar.

Findings

The team inspected 268 tires on 67 vehicles and found 35 of the tires were either leaking or had been repaired. We also inspected over 90 loose tires. Five of the 268 tires inspected on vehicles exhibited early signs of tread separation. Three of the five didn't show signs of puncture or repair.

- It appeared the tread on the Wilderness AT tire is more durable than competitive tires in the market.
- We inspected eight vehicles that were involved in rollovers and one that allegedly lost control due to tread separation.

In Riyadh, we interviewed the local Firestone tire dealer and learned:

- The Australian Special Service tire has been in market for five months and they no longer stock the OE tire.
- They see two tread separations per week at this location.
- They currently have only 25 Australian Special Service tires in stock.
- We saw a '98 Suburban with (Firestone Steeltex Radial R4S LT245) tires arrive with tread separation and minor body damage. The dealer denied warranty assistance due to low air pressure and age.

Firestone Distributor Contact

We met with Tamimi, the Firestone distributor for Saudi Arabia, to discuss tread separation and Special Service tire availability. Present at the meeting was the Managing Director of the Dubai Firestone office who reports to Firestone Japan. We learned that he advised Tamimi to order the Australian Special Service tire six months ago, since it was a better application for the market.

Fleet Contact

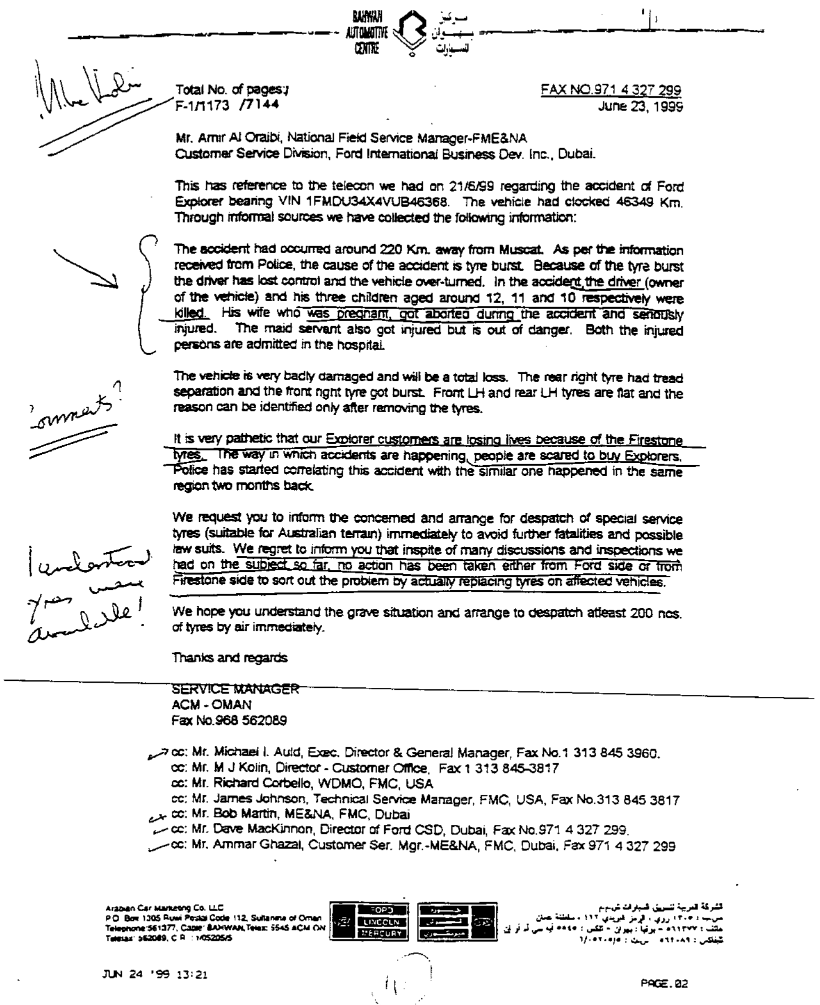
Al Jazirah requested we meet with Simon Eid, Sales Manager of Autoworld in Al Khobar. Simon indicated he operates a fleet of 800 vehicles of which 73 are Explorers. They have experienced numerous cases of tread separation with seven rollovers. He is in the process of changing all of the Firestone tires to Goodyear tires. The MENA office should be able to satisfactory resolve his concerns for under $ 50,000.00.

Summary

The majority of the tread separations were caused by low inflation pressures, improper repairs and the long tread life of the Wilderness AT tire. Based on the tires we saw we expect to see additional cases of tire tread separation.

Recommendations

- **Continue to promote the current SUV / Tire awareness program that includes our WDMO Export Technical Service Bulletin, Mirror Hangers and RMA poser that describe proper repair procedures.**
- **Aggressively encourage replacement of the Firestone Wilderness AT tire with the Australian Special Service tire or recommend replacements tires, as suggested by other tire manufactures such as Goodyear Wrangler RTS, Bridgestone Dueller or Dunlop Grand Trek.**
- **Handle each customer request for assistance with damage caused by tread separation on a "case by case basis".**
- **Have the PVT determine the correct tire to use on current and future production units for the GCC.**



BAHWAN AUTOMOTIVE CENTRE
مركز بهوان للسيارات

Mike Kolin

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FAX NO.971 4 327 299
June 23, 1999

Mr. Amir Al Oraibi, National Field Service Manager-FME&NA
Customer Service Division, Ford International Business Dev. Inc., Dubai.

This has reference to the telecon we had on 21/6/99 regarding the accident of Ford Explorer bearing VIN 1FMDU34X4VUB46368. The vehicle had clocked 46349 Km. Through informal sources we have collected the following information:

The accident had occurred around 220 Km. away from Muscat. As per the information received from Police, the cause of the accident is tyre burst. Because of the tyre burst the driver has lost control and the vehicle over-turned. In the accident the driver (owner of the vehicle) and his three children aged around 12, 11 and 10 respectively were killed. His wife who was pregnant, got aborted during the accident and seriously injured. The maid servant also got injured but is out of danger. Both the injured persons are admitted in the hospital.

Comments?

The vehicle is very badly damaged and will be a total loss. The rear right tyre had tread separation and the front right tyre got burst. Front LH and rear LH tyres are flat and the reason can be identified only after removing the tyres.

It is very pathetic that our Explorer customers are losing lives because of the Firestone tyres. The way in which accidents are happening, people are scared to buy Explorers. Police has started correlating this accident with the similar one happened in the same region two months back.

I understood tyres were available!

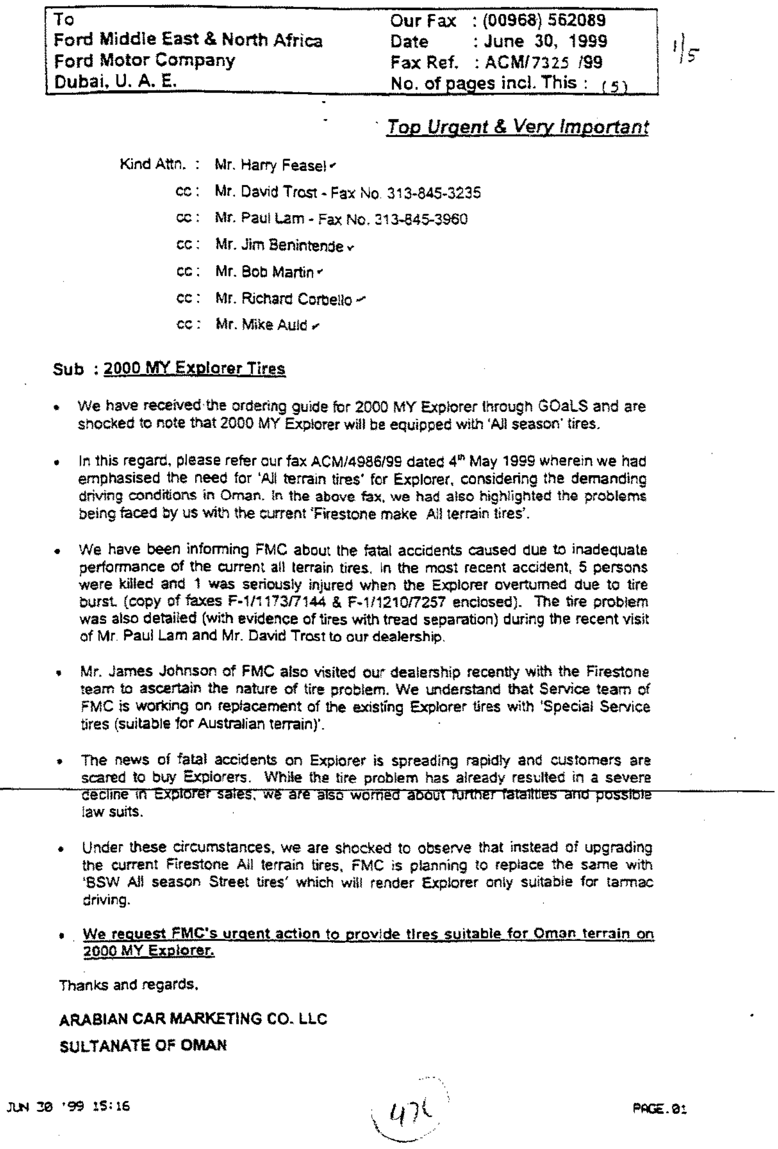
We request you to inform the concerned and arrange for despatch of special service tyres (suitable for Australian terrain) immediately to avoid further fatalities and possible law suits. We regret to inform you that inspite of many discussions and inspections we had on the subject so far, no action has been taken either from Ford side or from Firestone side to sort out the problem by actually replacing tyres on affected vehicles.

We hope you understand the grave situation and arrange to despatch atleast 200 nos. of tyres by air immediately.

Thanks and regards

SERVICE MANAGER
ACM - OMAN
Fax No.968 562089

cc: Mr. Michael I. Auld, Exec. Director & General Manager, Fax No.1 313 845 3960.
cc: Mr. M J Kolin, Director - Customer Office, Fax 1 313 845-3817
cc: Mr. Richard Corbello, WDMO, FMC, USA
cc: Mr. James Johnson, Technical Service Manager, FMC, USA, Fax No.313 845 3817
cc: Mr. Bob Martin, ME&NA, FMC, Dubai
cc: Mr. Dave MacKinnon, Director of Ford CSD, Dubai, Fax No.971 4 327 299.
cc: Mr. Ammar Ghazal, Customer Ser. Mgr.-ME&NA, FMC, Dubai, Fax 971 4 327 299



To Ford Middle East & North Africa Ford Motor Company Dubai, U. A. E.	Our Fax : (00968) 562089 Date : June 30, 1999 Fax Ref. : ACM/7325 /99 No. of pages incl. This : (5)

1/5

Top Urgent & Very Important

Kind Attn. : Mr. Harry Feasel ✓

cc : Mr. David Trost - Fax No. 313-845-3235

cc : Mr. Paul Lam - Fax No. 313-845-3960

cc : Mr. Jim Benintende ✓

cc : Mr. Bob Martin ✓

cc : Mr. Richard Corbello ✓

cc : Mr. Mike Auld ✓

Sub : 2000 MY Explorer Tires

- We have received the ordering guide for 2000 MY Explorer through GOaLS and are shocked to note that 2000 MY Explorer will be equipped with 'All season' tires.
- In this regard, please refer our fax ACM/4986/99 dated 4th May 1999 wherein we had emphasised the need for 'All terrain tires' for Explorer, considering the demanding driving conditions in Oman. In the above fax, we had also highlighted the problems being faced by us with the current 'Firestone make All terrain tires'.
- We have been informing FMC about the fatal accidents caused due to inadequate performance of the current all terrain tires. In the most recent accident, 5 persons were killed and 1 was seriously injured when the Explorer overturned due to tire burst. (copy of faxes F-1/1173/7144 & F-1/1210/7257 enclosed). The tire problem was also detailed (with evidence of tires with tread separation) during the recent visit of Mr. Paul Lam and Mr. David Trost to our dealership.
- Mr. James Johnson of FMC also visited our dealership recently with the Firestone team to ascertain the nature of tire problem. We understand that Service team of FMC is working on replacement of the existing Explorer tires with 'Special Service tires (suitable for Australian terrain)'.
- The news of fatal accidents on Explorer is spreading rapidly and customers are scared to buy Explorers. While the tire problem has already resulted in a severe decline in Explorer sales, we are also worried about further fatalities and possible law suits.
- Under these circumstances, we are shocked to observe that instead of upgrading the current Firestone All terrain tires, FMC is planning to replace the same with 'BSW All season Street tires' which will render Explorer only suitable for tarmac driving.
- **We request FMC's urgent action to provide tires suitable for Oman terrain on 2000 MY Explorer.**

Thanks and regards,

ARABIAN CAR MARKETING CO. LLC
SULTANATE OF OMAN

JUN 30 '99 15:16 476 PAGE.01

1996/97 Explorer / Mountaineer P255/70R16 Tire Separation in GCC and Malaysia

Draft of 7/08/99

1. **PROBLEM DESCRIPTION** (what/when/extent)

A. While driving vehicle, the tire tread separated (belt edge separation) from the main carcass of the tire. The tire failure is discovered when the driver hears the tire tread hitting the wheel house or the tire goes flat.

Incidences to date:

18 incidences have occurred in Saudi Arabia, Oman, and Qatar combined

2 incidences have occurred in Malaysia (15" tire)

All of these failures have been tire tread separation, all on '96 and '97 vehicles, all at mileages between 15,200 km and 55,000 km (9,500 - 34,000 miles).

B. Firestone P255/70R16 A/T ROWL tire, part # F57A-1508-JA, construction code ST369J, date codes on tires built between 10/25/95 and 2/19/97. This tire size and construction is a regular production option on U.S. models and is the standard size tire on almost every exported Explorer/Mountaineer except the base model going to Japan and Korea.

C. Vehicles Affected:

Model Year (s)	Vehicle Lines	Vehicle Volume	Variants	Other Limiting Factors
GCC				
1996	Explorer	2109	4X4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
1997	Expl./Moun..	1821	4X4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
1998	Expl./Moun.	1231	4X4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
1999	Expl./Moun.	TBD	4X4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
		5161		
Malaysia				
1996	Explorer	0	4x4, 4 dr, 4.0L, Auto	P235/75R15 A/T ROWL tire
1997	Explorer	109	4x4, 4 dr, 4.0L, Auto	P235/75R15 A/T ROWL tire
1998	Explorer	<40	4x4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
1999	Explorer	<80	4x4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
		229		

D. Markets Affected: Malaysia and GCC (Bahrain, Saudi Arabia, Oman, Qatar, Yemen, Jordan, Kuwait, Lebanon, Syria and United Arab Emirates).

E. CPSC Codes: 04.04.02.

2. DEFINE ROOT CAUSE

The root cause of the tire failures was determined to be tread separation from the tire carcass caused by one or more of the following contributing factors:

A. Low inflation operating situation - causing internal tire damage resulting in tread separation.

Improper repair

Tire repairs being done using unapproved rope type plugs. This type of repairs leak air, unbeknownst to the customer.

Unintentional under-inflation condition (puncture, other leak)

Customer gets slow leak from puncture and drive on under-inflated tire.

Valve stem leakage due to customer not replacing cap (50% occurrence)

Continued / Repeated use while under-inflated (after off-road usage)

Customers let air out of tires to drive in the desert, then drive back to a gas station at high speed with under-inflated tires.

FoV recommends a lower tire pressure than we do (to improve skate) and vehicle is driven vehicle at Vmax for long distances with these "under-inflated" tires.

B. Extended / Repeated use at high speed in high ambient temperatures

Tires are speed rated to run at rated speed (ie, 112 mph) for only a short period of time (20-30 minutes) before the tire starts to fail internally. Our customers in these countries are driving the Explorer as fast as 106 mph for hours, possibly several times a week, possibly every week of the year, for 3-4 years. Running the tires for long periods at high speeds have an accumulative affect on destroying the tire.

C. Extended / Repeated use at overloaded conditions in high ambient temperatures

Third row seat added to GCC sold vehicles can put the vehicle rear gross axle weight (RGAWR) above the allowable designed by Ford. This puts added loading into the tire, thus generating more heat in addition to the high ambient operating conditions and possible high vehicle speeds. These all add up to speeding up the destruction to the tire internally.

D. Fatigue failure accelerated by high temperatures

The tire rubber internal bonds start to break down when exposed to high temperatures for extended periods of time. This in conjunction with dynamic cycling (driving at high speeds) (which imparts additional heat into the rubber) breaks more of these bonds between the rubber molecules and between the rubber and the steel belts. This weakening/breaking of the bonds between the steel belt and the rubber is where the tire tread separation starts and "unzips" the tread.

E. Fatigue failure accelerated by ozone exposure (in areas near oil fields, eastern Gulf cities)

The high ozone levels near oil fields or oil refineries chemically attacks the rubber and breaks down the bonds linking the rubber molecules. We see this condition on the outer upper sidewall and shoulder area of the tires as cracks. These cracks can cause tread separation or sidewall bulges.

F. Please check the applicable item(s) in each category:

- Type: X Design ☐ Manufacturing ☐ Vehicle Assembly

  X Other (Specify - Customer - air pressure or Road Hazard -Puncture)

- System: ☐ Body X Chassis ☐ Cooling ☐ Fuel ☐ Electrical ☐ Engine

  ☐ Glass ☐ Restraints ☐ Transmission/Axle

  X Vehicle Label/Publications ☐ Emissions Control

  ☐ OBD X Other (Field repair procedures)

- Symptom: ☐ Brake Control ☐ Emission Compliance

  ☐ Other Regulatory Compliance ☐ Driveability/No Start

  ☐ Engine Speed Control/Unexpected Movement ☐ Fire

  X Steering Control ☐ Occupant Restraint X Personal Injury

  ☐ Visibility X Warranty Avoidance /Customer Satisfaction

  X Other (Vehicle damage)

3. PROBLEM INVESTIGATION/VERIFICATION DATA

A. Lab tests -

Running Special High Speed Testing at Reduced Pressures on:

The current 16" tire, severe duty 16" tire for Australia, H-rated tire for EAO, and 6 competitive vehicle tires (Dunlop, Bridgestone, Yokohama, Goodyear, and Michelin) that are sold in the GCC countries. The findings are that all the tires failed at about the same interval for the same speed rated tire. The only exception is the Dunlop tire that ran an additional 2 speed steps as if the tire was really an H-rated tire instead of an S-rated as labeled.

B. Vehicle tests - None

C. Plant/supplier reports - Supplier (Bridgestone/Firestone of Japan) has been contacted in Japan for Malaysia incidents, and U.S. office has been contacted on GCC incidents. Ford Explorer OPD Engineering has been contacted on all three region incidences.

D. Quality Indicator System - 2 CQIS reports have been received on Malaysia incidents.

E. Field reports - 18 from GCC
2 from Malaysia

F. Parts sales — Tires are not sold thru Ford dealers. Therefore no service parts count is available on problem tires.

G. Number of accidents/fines and injuries: 18 accidents in GCC
7 fatalities, 8 minor injuries, 2 unknown injury
2 incidences, no reported injuries in Malaysia.

4. Actions Taken in Production; Interim (Containment) and/or Permanent

A. Corrective actions – None at this time.

B. Notification – None at this time.

C. Provide WERS alert number - None at this time.

D. Component batch issues – None at this time.

5. VERIFY EFFECTIVENESS OF CORRECTIVE ACTIONS

A. A. No corrective action taken yet.

6. ESTIMATED PRODUCTION AND PROBLEM STATISTICS (MAGNITUDE OF CONCERN)

A. Production Involved

VEHICLES AFFECTED (BY MODEL AND MODEL YEAR)	ASSEMBLY PLANTS* (INCLUDING KNOCK DOWN OPERATIONS)	VEHICLE PRODUCTION DATES		POTENTIALLY AFFECTED UNITS	
		FROM	UP TO AND INCLUDING	NUMBER OF UNITS	ESTIMATED PERCENTAGE OF VEHICLES THAT CONTAIN THE CONDITION
1996/98 Explorer / Mountaineer	LAP	8/1/95	7/30/98	5390	N/A %
1996/99 Explorer	SLAP	8/1/95	7/30/99	0	0 %
1999 Explorer / Mountaineer	LAP	8/1/98	7/30/99	TBD	N/A %

B. Melanie Gumz of WDMO (GCC) and Diana Glass from Q&PL New Markets (Malaysia)

7. AFTERMARKET PARTS

A. Released for Service: part is released for service but Ford does not stock any tires for service.

B. Tires are not stocked by depot or by Ford dealers. Firestone must determine whether they want to purge their inventory of tires at their distributor and tire stores in these export regions.

8. ASSESSMENT OF EFFECT ON VEHICLE OPERATION

This particular tire failure has resulted in customers losing control of their vehicles with reported roll over conditions, however, we don't have definite information on the actual cause of the accidents.

Roll over conditions are a result of the vehicle going off the road into soft soil conditions, from changing road coefficients of friction (ie, wet to dry) or when the wheel digs into the pavement or ground and the vehicle rolls.

9. DESCRIPTION OF CONCERN SOLUTION AND PARTS REQUIREMENTS (FIELD SERVICE ACTIONS)

Short Term Actions:

A. **PRIME** - Have the dealers replace all the tires on every Explorer/Mountaineer after 20,000 miles (32,000 km) or 18 months after the build date (not sold date) (whichever is shorter) with the carryover Firestone Wilderness P255/70R16 A/T tires. This will assure that tires have not been in the field long enough to experience these heat related failures.

B. Same as above but have the dealers replace the tires with our "Special Service" Firestone Wilderness P255/70R16 A/T tire as they become available. We do not have enough of these tires in the GCC region, and Firestone is capacity constrained at this time to be able to support the GCC region with enough tires (~21,000 needed) for this potential action.

C. Explorer OPD Chassis Engrg. is working on proving out 2 tires that the GCC markets have recommend for their conditions. It will take Engineering 2-3 weeks to prove out these 2 tires (Goodyear Wrangler RT/S, and Bridgestone Dueler AT) are safe for the vehicle before we recommend fitment to the vehicle as a dealer fix.

Long Term Actions:

A. No long term prime action has been assessed yet.

B. Test processes, plant complexity, market wants and other factors will be thoroughly considered in developing a long term action.

-A test procedure needs to be developed by RVT to access one tire over another for this harsh operating environment.

-Assembly plant complexity needs to be addressed (LAP has no room for another tire)

-Market wants need to be addressed (GCC region does not want a Firestone tire)

-Should all Ford trucks investigate the capabilities of the tires being exported to GCC region.

-U152 and all other SUV's should have Low Tire Pressure Warning systems fitted when shipped to GCC region.

FIELD SERVICE ACTION EVALUATION PAPER (14D) TRANSMITTAL

FIELD REVIEW COMMITTEE

99B18

To: (North America)
Secretary, FRC
Suite 785
Diagnostic Service Center II
Ford Customer Service Division — North America

To: (Europe)
Secretary, FRC
Room GB-1/329,
Ford Customer Service Division — Europe

The attached Evaluation Paper is being forwarded for review by the Field Review Committee. Copies have been submitted for review to:

Office of the General Counsel:	YES ☐	NO ☐
Vehicle Environmental Engineering:	YES ☐	NO ☐
Automotive Safety Office:	YES ☐	NO ☐
VC Purchasing Director	YES ☐	NO ☐

Subject: Explorer/Mountaineer P255/70R16 Tire Separation in GCC Countries

Approve: A. Vandecaveye For Dale Claudepierre
Vehicle Line Director
7/27/99
Date

Approve:
Vehicle Center Engineering Director
7/27/99
Date

Approve:
FCSD Vehicle & Service Programs Director
7/27/99
Date

Note: Vehicle Line Director and/or VC Engineering Director signatures are required prior to Review by the Field Review Committee.

I. **PROBLEM DESCRIPTION** (what/when/extent)

A. While driving vehicle, the tire tread separated (belt edge separation) from the main carcass of the tire. The tire failure is discovered when the driver hears the tire tread hitting the wheel house or the tire goes flat.

Rollovers attributed to tire tread separation:

- 19 rollovers attributed to tire tread separation have occurred in Saudi Arabia, Oman, and Qatar combined.
  - These failures have been '96 and '97 vehicles, all at mileages between 15,200 km and 55,000 km (9,500 - 34,000 miles).

B. Firestone P255/70R16 A/T ROWL tire, part # F57A-1508-JA, construction code ST369J, date codes on tires built between 10/25/95 and 2/19/97. This tire size and construction is a regular production option on U.S. models and is the standard size tire on almost every exported Explorer/Mountaineer except the base model going to Japan and Korea. The GCC countries have unique customer usage patterns and environmental conditions as compared to other markets.

C. Vehicles Affected:

Model Year (s)	Vehicle Lines	Vehicle Volume	Variants	Other Limiting Factors
GCC				
1995	Explorer	525	4X4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
1996	Explorer	2162	4X4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
1997	Expl./Moun..	2071	4X4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
1998	Expl./Moun.	1488	4X4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
1999	Expl./Moun.	509	4X4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
		6755		

D. Markets Affected: GCC countries (Bahrain, Saudi Arabia, Oman, Qatar, Yemen, Jordan, Kuwait, Lebanon, Syria and United Arab Emirates).

E. CPSC Codes: 04.04.02.

2. DEFINE ROOT CAUSE

The root cause of the tire failures was determined to be tread separation from the tire carcass caused by a combination of the following contributing factors which are unique to Persian GCC customer usage and environmental conditions.

A. Low inflation operating situation - causing internal tire damage resulting in tread separation caused by the following issues.

Improper repair

Tire repairs being done using unapproved rope type plugs. This type of repair may leak air, potentially unbeknownst to the customer.

Unintentional under-inflation condition (puncture, other leak). Customer gets slow leak from puncture and drives on under-inflated tire.

Valve stem leakage due to customer not replacing cap (50% occurrence)

Continued / Repeated use while under-inflated (after off-road usage)

Customers let air out of tires to drive in the desert, then drive back to a gas station at high speed with under-inflated tires.

B. Extended / Repeated use at extremely high speed in high ambient temperatures

Tires are speed rated per SAE procedure J1561 to run at rated speed (ie, 112 mph) for only a short period of time (10 minute steps at 38 psi) before the tire starts to fail internally. Our customers in these countries are driving the Explorer as fast as 106 mph for hours, possibly several times a week, possibly every week of the year, for 3-4 years. Running the tires for long periods at high speeds have an accumulative affect on destroying the tire.

C. Extended / Repeated use at overloaded conditions in high ambient temperatures

Third row seat added to GCC sold vehicles puts added loading into the tire, thus generating more heat in addition to the high ambient operating conditions and high vehicle speeds. These all add up to speeding up the destruction to the tire internally.

D. Fatigue failure accelerated by high temperatures

The tire rubber internal bonds start to break down when exposed to high temperatures for extended periods of time. This in conjunction with dynamic cycling (driving at high speeds) (which imparts additional heat into the rubber) breaks more of these bonds between the rubber molecules and between the rubber and the steel belts. This weakening/breaking of the bonds between the steel belt and the rubber is where the tire tread separation starts and "unzips" the tread.

E. Fatigue failure accelerated by ozone exposure (in areas near oil fields, eastern Gulf cities)

The high ozone levels near oil fields or oil refineries chemically attacks the rubber and breaks down the bonds linking the rubber molecules. We see this condition on the outer upper sidewall and shoulder area of the tires as cracks. These cracks can cause tread separation or sidewall bulges.

F. Please check the applicable item(s) in each category:

- Type: X Design ☐ Manufacturing ☐ Vehicle Assembly
  X Other (Specify - Customer - air pressure or Road Hazard -Puncture_)
- System: ☐ Body X Chassis ☐ Cooling ☐ Fuel ☐ Electrical ☐ Engine
  ☐ Glass ☐ Restraints ☐ Transmission/Axle
  X Vehicle Label/Publications ☐ Emissions Control
  ☐ OBD X Other (Field repair procedures_)
- Symptom: ☐ Brake Control ☐ Emission Compliance
  ☐ Other Regulatory Compliance ☐ Driveability/No Start
  ☐ Engine Speed Control/Unexpected Movement ☐ Fire
  X Steering Control ☐ Occupant Restraint X Personal Injury
  ☐ Visibility X Warranty Avoidance /Customer Satisfaction
  X Other (Vehicle damage)

3. PROBLEM INVESTIGATION/VERIFICATION DATA

A. Lab tests -

Running Special High Speed Testing at Reduced Pressures (20 psi) on:

The current 16" tire, severe duty 16" tire for Australia, H-rated tire for EAO. 6 competitive vehicle tires (Dunlop, Bridgestone, Yokohama, Goodyear, and Michelin) that are sold in the GCC countries, and Goodyear tire construction that we plan on retrofitting to the vehicles in GCC. The Goodyear tire is marginally better for high speed and puncture resistance versus the Firestone control tire. All the other tires failed at about the same interval for the same speed rated tire. The only exception is the Dunlop Grand Trek and Bridgestone Desert Dueler tire that ran an additional 2 speed steps as if the tire was constructed like an H-rated tire but labeled as an S-rating.

B. Vehicle tests - None

C. Plant/supplier reports - Supplier (Bridgestone/Firestone of Japan) has been contacted in Japan and U.S. on GCC incidents. Ford Explorer OPD Engineering has been contacted on GCC incidences.

D. Quality Indicator System - No reported CQIS reports have been received on GCC incidents. All incidences reported thru WDMO.

E. Field reports - 19 from GCC

F. Parts sales — Tires are not sold thru Ford dealers. Therefore no service parts count is available on problem tires.

G. Number of accidents/fines and injuries: 19 accidents in GCC
14 (??) fatalities, 8 minor injuries, 2 unknown injuries

4. ACTIONS TAKEN IN PRODUCTION; INTERIM (CONTAINMENT) AND/OR PERMANENT

A. Corrective actions – Release Goodyear Wrangler RT/S (DOT code WDO) tire for 2000 MY Explorer.

B. Notification – C11003512 issued 8-10-99. (NL00-E-11003512-000) released TBD.

C. Provide WERS alert number - A11003512 issued 8-10-99.

D. Component batch issues – None at this time.

5. VERIFY EFFECTIVENESS OF CORRECTIVE ACTIONS

A. A. No corrective action effectiveness assessment available yet.

6. ESTIMATED PRODUCTION AND PROBLEM STATISTICS (MAGNITUDE OF CONCERN)

A. Production Involved

VEHICLES AFFECTED (BY MODEL AND MODEL YEAR)	ASSEMBLY PLANTS* (INCLUDING KNOCK DOWN OPERATIONS)	VEHICLE PRODUCTION DATES		POTENTIALLY AFFECTED UNITS	
		FROM	UP TO AND INCLUDING	NUMBER OF UNITS	ESTIMATED PERCENTAGE OF VEHICLES THAT CONTAIN THE CONDITION
1995/98 Explorer / Mountaineer	LAP	8/1/94	7/30/98	6246	N/A %
1995/99 Explorer	SLAP	8/1/94	7/30/99	0	0 %
1999 Explorer / Mountaineer	LAP	8/1/98	7/30/99	509	N/A %

B. Kelly Zubieta of FCSD from LAP (GCC)

7. AFTERMARKET PARTS

A. Released for Service: part is released for service but Ford does not stock any tires for service.

B. Tires are not stocked by depot or by Ford dealers. Firestone must determine whether they want to purge their inventory of tires at their distributor and tire stores in these export regions.

8. ASSESSMENT OF EFFECT ON VEHICLE OPERATION

This particular tire failure has resulted in customers losing control of their vehicles with reported roll over conditions, however, we don't have definite information on the actual cause of the accidents.

Roll over conditions are a result of the vehicle going off the road into soft soil conditions, from changing road coefficients of friction (ie. wet to dry) or when the wheel digs into the pavement or ground and the vehicle rolls.

9. DESCRIPTION OF CONCERN SOLUTION AND PARTS REQUIREMENTS (FIELD SERVICE ACTIONS)

Short Term Actions:

A. Explorer OPD Chassis Engrg. has proven out one tire (because Firestone/Bridgestone cannot support the recall volume). Vehicle Development has completed the ride and handling evaluations, (Goodyear Wrangler RT/S, const. code 3D0024A, DOT code WDO) to demonstrate the safe performance of this tire for the vehicle. All other requirements are completed and have passed.

On '95 thru '97 vehicles we will be replacing the 4 road tires only (not the spare) because the spare is a different tire size (15") and construction. On '98 and '99 vehicles we will be replacing all 5 tires because the spare tire is the same size and construction as the 4 road tires. We will not be changing tires on any vehicle that comes in that that has had the tires changed from Firestone to some other brand tire.

Remind customers on '95-'97 vehicles that the spare tire is of a different size (15") than the road tire, and that the vehicle should not be driven for an extended period of time with the spare tire and that the speed should be limited to no more than 50mph while the spare is fitted to the vehicle.

We will also be re-flashing the engine controller to lower the top speed of the vehicle from 106 mph to 99 mph. This will put the vehicles top speed one T&RA speed step (6mph) below the tires speed capability.

2000 MY Explorers going to GCC markets (including Egypt) will be fitted with the Goodyear tires and the top speed of the vehicle will be reduced by 6mph to 99mph. The 3rd row seat option is being deleted from the GCC ordering guide.

Long Term Actions:

A. No long term prime action has been assessed yet.

B. Test processes, plant complexity, market wants and other factors will be thoroughly considered in developing a long term action.

-A test procedure needs to be developed by RVT to access one tire over another for this harsh operating environment.

-The GCC Markets do not want a Firestone tire. This issue has given Firestone a black eye in this market.

-Should all Ford trucks investigate the capabilities of the tires being exported to GCC region.

-U152 and all other SUV's should have Low Tire Pressure Warning systems fitted when shipped to GCC region.

10. PROGRAM PARTS SIGN OFF/AVAILABILITY

Goodyear Wrangler RT/S tire P255/70R16 A/T OWL part number F65A-1508-TA (DOT code WDO) is available and fully approved and PPAP'd. No tooling is needed for this part number.

Part availability schedule:

F65A-1508-TA	30,000 parts available in warehouses

11. SUPPLIER INVOLVEMENT (if applicable)

A. The name of the causal part supplier:

Bridgestone / Firestone, Inc.
One Towne Square, Suite 1470
Southfield, MI 48076-3705
John Behr, Account Executive 248-208-3623

B. This condition is component-related, and is specifically related to the unique customer usage patterns and environmental conditions of the Persian Gulf Coast States.

C. Percentage of the root cause contributed by the supplied component - TBD

D. Deliver copy of this paper to tire buyer George Coundouriotis when completed and approved.

E. Manufacturing site code for the responsible supplier location - F593A.

F. Judith Sullivan JSULLIV4 x-47679 (Manager) / George Coundouriotis GCOUNDOU x-46803 (Buyer). Ford STA field engineer for Firestone is Lewis Garcia LGARCIA3 at 313-248-6211.

G. At the time of Advice of Field Service Action is approved, the engineer must forward the revised Field Service Action Evaluation paper to the FAO Controllers Office (QMP. MD626, PO. 1587A, Room 486) in North America, or to GB-15/4B-E15 in Europe.

12. FINANCIAL IMPLICATIONS

A. **Note:** If assistance is needed, contact the **Ford Customer Service Division, Recalls & Service Programs** (**For Europe: Room GB-1/329, Telephone:** 8734-2049, **for North America, DSC II, Room 785, 24-88817**).

		Vehicle Volume	Cost Per Unit	Total Cost (000)
A	Program Administration Costs	6800		
B	Inspection Costs (Units to be Inspected but Not Modified) . Labor	0		
C	Modification Costs(Units to be Inspected and Modified) • Parts			
D	Shipping - Air NGS Cards and Flash Cables		REDACTED	
E	Dealer Administration Allowance (for safety and emissions recalls only)			
F	Total Cost (total A through E)			
G	Percentage of Recommended Supplier Recovery (if applicable or TBD if unknown)			
H	Supplier Impact (E * F, if applicable)			
I	Net FORD Exposure (E-G)			
J	Potential Warranty Offset			

Purchasing, Engineering, and other appropriate activities will jointly determine the extent of supplier financial responsibility. If supplier reimbursement is warranted in the field service action, purchasing will negotiate cost recovery.

[illegible]

13. PREVENT ACTIONS

A. Low inflation operating situation -

- Firestone and WDMO to work with local GCC government agencies and tire distributors to change tire repair procedures to current world industry standards.

- Low pressure warning device (part of IVD) is being recommended for future SUV's (U152, U231, U222) going to this region to warn customer's of under-inflated tires.

Extended/repeated use at extremely high speed -

- Tire SDS, ES spec and WDMO Regulations to be modified to include the following for SUV's going to GCC markets:

  -Use tire with speed rating at least one (1) level higher than the vehicle max speed when adjusted for vehicle recommended tire pressure. If this tire construction does not exist, then speed limit the vehicle to one speed level (6mph) below the tires speed capability when adjusted for vehicle recommended tire pressure.

  - Tire should have a minimum of a "A" temperature rating by the UTQG system.

  -Tire should be of a "special service" construction for extreme puncture resistance.

Extended/repeated use at overloaded conditions -

- Tire SDS and WDMO to be directed that any added seating configuration must be certified not to exceed the vehicle GAWR and must be evaluated for max handling by Vehicle Engrg for that vehicle.

- U152 is being designed with 3rd row seating as an option. 2000MY GCC Explorers will have 3rd row seat option deleted from GCC ordering guide.

Fatigue failure accelerated by high temperature and ozone-

- RVT to establish a test procedure to determine minimum tire requirement for this market. Test will be added to tire SDS and ES Spec.

B. Identify how "generic" items or processes could be impacted similarly and how such impact will be prevented.

C. State what "Corporate Memory" Documents (e.g., Engineering Design Standards, World Class Requirements, FMEA, etc.) have been or will be updated to provide guidance for future campaign prevention. Include the scheduled or actual timing for the above actions.

14. REFERENCE DATA

A. Presenter - Allan Rauner, ARAUNER, 59-42821, Explorer Chassis OPD.

B. Each page of the evaluation paper should indicate "Draft of (Date)." Draft papers should not be stamped with a "Record Copy" retention stamp.

C. When programs are recommended for implementation by the Field Review Committee, the reporting organization is to incorporate any changes in the draft paper recommended by the FRC and within two weeks, submit the final paper to the Secretary of the FRC for filing (For North America , Diagnostic Service Center II, Suite 785, for Europe, Room G-1/329, Recall and Service Programs, FCSD-E).

```
From: OROMERO --DRBN007                         Date and time    08/17/99 17:41:10
To: ECABALL1--DRBN007                        ADASILVA--DRBN007
    CHARON  --DRBN007                        MRUIZ2  --DRBN007
    JTORRENS--DRBN007                        GFEO    --DRBN007
cc: RMORENO6--DRBN007                        FGRAU1  --DRBN007

FROM: Oscar Romero                      VENEZUEL(UTC -04:00)
Subject: Owner Notification Program 99B18
Anexo nombre y contenido de la campana de cauchos Firestone en el Golfo Persico

Regards,
Oscar Romero
FOV Vehicle Standards, Validation and Service Eng.
Tlf: Ford Dialnet 9-1-7650-145 Fax: 9-1-7650-311
*** Forwarding note from CLEITE1 --DRBN005  08/17/99 14:49 ***
To: OROMERO --DRBN007

FROM: Carlos Leite                             BRAZEAST(UTC -03:00)
Subject: Owner Notification Program 99B18
I think that this is your concern too, isn't it?

Regards,
Carlos A. S. Leite
South American Regional Service Manager - FCSD VS&P
tel.55 11 754-4125  fax 55 11 754-4280  Fordnet 540-4125
*** Forwarding note from KZUBIETA--DRBN006  08/17/99 13:15 ***
To: Campaign Announcement Distribution List

FROM: Kelly Zubieta                            USAET(UTC -04:00)
Subject: Owner Notification Program 99B18
Regards,
Kelly Zubieta
FCSD, Recall/Service Programs, Recall/ONP Coordinator
313-248-8817  Fax: 313-845-1024  Internet: KZUBIETA@Ford.com
*** Forwarding note from AONEILL --FORDNA1  08/17/99 13:03 ***
To: TBAUGHMA--FORDNA1  ""Baughman, Thoma DCLAUDEP--FORDNA1  ""Claudepierre, D
    WBOHAN  --DRBN005  ""Bill Bohan""    BWOMAC  --VISTEON  ""Bob Womac""
    CMAZZORI--FORDNA1  ""Carlos Mazzorin CTHEOD01--FORDNA1  ""Chris Theodore"
    CMUHLHAU--VISTEON  ""Craig Muhlhause DTHURSFI--DRBN004  ""David Thursfiel
    GBEDI   --FORDNA1  ""Gurminder Bedi" HPETRAUS--FORDNA1  ""Helen Petrauska
    JPASKUS --FORDNA1  ""Jack Paskus""   JOCONNOR--FORDNA1  ""James O'Connor"
    JMULLIN5--FORDNA2  ""Janet Mullins"" JLOGEL  --FORDNA1  ""Jay Logel""
    JMARTIN2--FORDNA1  ""Jerree Martin"" JDONALDS--FORDNA1  ""Jim Donaldson""
    JPADILL4--DRBN005  ""Jim Padilla""   JDEVINE1--FORDNA1  ""John Devine""
    JRINTAMA--FORDNA1  ""John Rintamaki" KKOZLOWS--FORDNA1  ""Kate Kozlowski"
    KZUBIETA--DRBN006  ""Kelly Zubieta"" KWILUSH --FORDNA2  ""Kevin Wilush""
    LHANSEN --FORDNA1  ""Lloyd Hansen""  LGOESER --FORDNA1  ""Louise Goeser""
    MHUTCHI1--FORDNA2  ""Mark Hutchins"" MJORDAN8--FORDNA1  ""Mike Jordan""
    MVAUGHN --FORDNA1  ""Mike Vaughn""   NRESSLER--FORDNA1  ""Neil Ressler""
    RPARRYJ2--FORDNA1  ""Richard Parry-J RWIDMER1--FORDNA1  ""Robert Widmer""
    RKRYGIER--DRBN007  ""Roman Krygier"" RGOLDSBE--FORDNA1  ""Ron Goldsberry"
    RROBER11--FORDNA1  ""Ross Roberts""  SPARKIN3--DRBN006  ""Steve Parkin""
    TBEHRIK1--FORDNA1  ""Terri Behrik""  TSVENSON--DRBN007  ""Thomas Svenson"
    TSAYBOLT--FORDNA1  ""Tom Saybolt""   VKOSHKAR--DRBN005  ""Vaughn Koshkari
    WBODDIE --FORDEU1  ""Will Boddie""   WFORD   --FORDNA1  ""William Clay Fo
    WHOGUE  --FORDNA1  ""William Hogue""

FROM: O'Neill, Ann (A.R.)                     W24(UTC -0400)
Subject: Owner Notification Program 99B18
```

Owner Notification Program 99B18 - 1995-99 MY Explorer and Mountaineer Vehicles in Gulf Coast Countries - P255/70R16 Tires

Ford has received reports of tread separation on P255/70R16 All-Terrain Firestone Wilderness A/T brand tires installed on 1995-99 MY Explorer and Mountaineer vehicles sold in the Gulf Coast Countries (GCC). Unique GCC usage patterns, environmental conditions and maintenance practices may result in tire degradation and potentially, tread separation. Nineteen rollovers, fourteen fatalities and ten injuries are alleged to have been attributed to this condition.

Approximately 6,800 1995-99 MY Explorer and Mountaineer vehicles produced at the Louisville Assembly Plant from Job 1, 1995, through July 30, 1999, are potentially affected.

Based on the Field Review Committee recommendation, a field action has been approved to request owners to return potentially affected vehicles to dealers for replacement of the Firestone Wilderness brand tires with Goodyear Wrangler brand tires.

The estimated cost of this program is $ 4.3 million.

Ann O'Neill, Director
Vehicle Service and Programs
DSC-1 (Diagnostic Service Center 1, Room 2)
PH: 323-8467   FAX: 845-2580
Outlook User - Please view calendar on the Web

WILDERNESS FIRESTONE TIRE/ VENEZUELA Draft of 08/23/99

FIELD REVIEW COMMITTEE

To:

Secretary, FRC
Suite 785
Diagnostic Service Center II
Ford Customer Service Division – North America

The attached Evaluation Paper is being forwarded for review by the Field Review Committee. Copies have been submitted for review to:

Office of the General Counsel: YES ☐ NO ☐

Vehicle Environmental Engineering: YES ☐ NO ☐

Automotive Safety Office: YES ☐ NO ☐

VC Purchasing Director: YES ☐ NO ☐

Subject: Wilderness Firestone tire / Venezuela – loss of tire tread.

Concur: ____________________
Vehicle Line Director

____
Date

Concur: ____________________
Vehicle Center Engineering Director

____
Date

Concur: ____________________
FCSD Vehicle & Service Programs Director

____
Date

Approve: ____________________
Vice Center Vice President

____
Date

Approve: ____________________
FSCD Vice President

____
Date

WILDERNESS FIRESTONE TIRE/ VENEZUELA Draft of 08/23/99

1. PROBLEM DESCRIPTION

A. While driving vehicle, the tire tread separated (belt edge separation) from the main carcass of the tire. The tire failure is discovered when the tire goes flat.

Rollovers attributed to ~~tire separation~~: [illegible]

As of 08/23/99, there have been an estimated of fifty (50) accidents. Estimates are that 45 accidents are Explorer vehicles (70% equipped with P255/70R16, 30% equipped with P235/75R15). 5 accidents are F-150's equipped with P255/70R16. These accidents were attributed to tire tread separation while driving in Venezuela, Colombia and Ecuador.

These failures have been '96, '97, '98 and '99 vehicles. Venezuela, Ecuador and Colombia have unique customer usage patterns and environmental conditions as compared to other markets. [illegible]

[illegible]

B. Firestone P255/70R16 Wilderness AT 109S Tire: [illegible]

Engineering part #:	F57A1508-JA	(Black letters)
	F85A1508N -1A	(White letters)
P235/75 R15 Wilderness AT 109S Tire:		
Engineering part #:	987K1508-BA	(Black letters)
	987k1508- AA	(White letters)

[illegible] Firestone

Service part:	P255/70R16 Wilderness AT Tire	(Black letters)
	P255/70R16 Wilderness AT Tire	(White letters)
	P235/75 R15 Wilderness AT Tire	(Black letters)
	P235/75 R15 Wilderness AT Tire	(White letters

C. Vehicles Affected:

- **Part name: P255/70R16 Wilderness AT 109S:** Explorer 4x4 and F-150 4x2
  P235/75 R15 Wilderness AT 109S: Explorer 4x2

Model Year(s)	Vehicle Line	Vehicle volume	Variants	*Tires*
1996	Explorer	*	4x4, Manual, Automatic, 4.0L.	255/70 R16 AT
1997	Explorer	1.810	4x4, Manual, Automatic, 4.0L.	"
1998	Explorer	8.339	4x4, Manual, Automatic, 4.0L.	"
1999	Explorer	2.376	4x4, Manual, Automatic, 4.0L.	"
1996	Explorer	*	4x2 Manual, Automatic, 4.0L.	P235/75R15
1997	Explorer	628	4x2 Manual, Automatic, 4.0L.	
1998	Explorer	5.933	4x2 Manual, Automatic, 4.0L.	
1999	Explorer	1.519	4x2 Manual, Automatic, 4.0L.	

1998	F-150	6.310	4x2, Manual, Automatic, , 4.2 L and 5.4 L.	P255/70R16
1999	F-150	1.232	4x2, Manual, Automatic, , 4.2 L and 5.4 L.	"

* This is just an approximation, precise numbers will be provided later.

D. **Markets Affected:** Venezuela, Colombia and Ecuador market.

E. **CPSC:** 04.04.02

2. DEFINE ROOT CAUSE

The root cause of the failures was determined to be tread separation from the tire carcass caused by a combination of the following contributing factors which are unique to the Venezuelan, Colombian and Ecuatorian customer usage and environmental conditions.

A. Low inflation operating situation – causing internal tire damage resulting in tread separation caused by the following issues.

Improper repair:

Bad repairs. Tire repairs being done on tires' walls. This type of repair may leak air, potentially unbeknown to the customer.

Unintentional under-inflation condition (puncture, other leak). Customer gets slow leak from puncture and drives on under-inflated tire.

Valve stem leakage due to customer not replacing cap, resulting in the allowance of external objects getting into the valve.

Bad maintenance, the customer does not rotate their tires.

Continue/ Repeated use while under-inflated

Due to that the customer does not realize that he/she is driving under inflated, they drive at high speed for prolonged periods of time.

B. Extended / Repeated use at extremely high speed in high ambient temperatures

For the P235/75R15 and P255/70 R16 (locally sourced) tires are non speed rated per DOT 571-109 (demand 30min. 160 KPH) and COVENIN 663-96 to run at rated speed (136KPH) for only a period of time of 30 min, and 10 min. 160 KPH . before the tire starts to fail internally (under lab testing conditions and specifics procedures).

For the P255/70R16 (North American sourced) tires are "S" speed rated per SAE procedure J1516 to run at rated speed (ie, 180KHP) for only a short period of time(10 min. steps at 38 psi) before the tire starts to fail internally (under lab testing conditions and specifics procedures).

We have reports of both tires, locally manufactured and U.S. manufactured tires, failling.

Our customers in Venezuela, Ecuador and Colombia are driving the Explorer and F-150 as fast as 160 KPH ~100MPH for hours, possibly several times a week, possibly every week of the year, for 3-4 years. Running the tires for long periods at high speeds have an accumulative effect on destroying the tire.

C. Extended / Repeated use at overload conditions in high ambient temperatures

We have found customer using the Explorer with eight people (adults and children) inside the truck with additionally luggages and camping equipment. This generate more heat in addition to the high ambient operating conditions and high vehicle speeds. These all ad up to speeding up the destruction to the tire internally.

D. Fatigue failure accelerated by high temperatures

E. Please check the applicable item(s) in each category:

- Type: ✓ Design Manufacturing Vehicle Assembly
  Other (If other, specify _____)

- System: Body Chassis Cooling Fuel Electrical
  Engine Glass Restraints Transmission/Axle
  Vehicle Label/Publications Emissions Control
  OBD ✓ Other (Suspension)

- Symptom: Brake Control Emission Compliance
  Other Regulatory Compliance ✓ Driveability / Not Start
  Engine Speed Control/Unexpected Movement Fire
  Steering Control Occupant Restraint ✓ Personal Injury
  Visibility Warranty Avoidance / Customer Satisfaction
  Other (If other, specify _______)

3. PROBLEM INVESTIGATION/VERIFICATION DATA

A. Lab tests:

The Firestone experts determined that taking samples to their lab in order to run more tests was not required.

B. Vehicle tests:

In field trip a total of 37 vehicles were examined without locating a sample that could reproduce the exact failure. There were damages done to the tires such as: superficial or to the steel punctures, under inflated tires, bad reparations, damage on the walls etc, but not tread separation.

C. Plant / Supplier reports:

al

Supplier (Bridgestone / Firestone of Venezuela) has been contacted in Venezuela and U.S. about Venezuelan, Colombian and Ecuador incidents. Their report is promised on 08/23/99.

D. Quality Indicators System: None

E. Field reports: an approximate of 50 from Venezuela, Ecuador, Colombia. The majority of cases have occured in Venezuela.

F. Parts sales: Service changes are handled through Firestone dealers.

G. Number of accidents/fines and injuries: There have been an estimated of fifty accidents
Twelve lawsuits,
Fifteen fatalities and 35 injured persons.

4. ACTIONS TAKEN IN PRODUCTION; INTERIM (CONTAINMENT) AND/OR PERMANENT

A. **Interim corrective actions (Explorer only):** New tire with a higher speed rating (S), Cap-PLY reinforcement and polyester materials for construction was developed. The use of the new tire in production was on the 06/15/99 (DOT-259). Additionally, the tire inflation pressure was recommended to be of 30-32 psi as of 5/1/99 (previously set to 26-28psi for FOV vehicles only). A new shock absorber was also released.

A recall process on tires have not started yet.

B. **Notification: Release number:** 98-229-2, 98-228-2, 98-050-6, 96-023-9 of 06/01/99

C. **WERS alert number:** None.

D. **Component batch issues:** None

38psi 32 24 20 tires

need to run to failure and at higher speed

5. VERIFY EFFECTIVENESS OF CORRECTIVE ACTIONS

A. The interim corrective tires were bench tested at 160 KPH (100 ~~MPH) for~~ a period of four continuos hours without failure. More test of effectiveness ~~have~~ been done yet. ?

[illegible]

6. ESTIMATED PRODUCTION AND PROBLEM STATISTICS (MAGNITUDE OF CONCERN)

VEHICLES AFFECTED	ASSEMBLY PLANTS	VEHICLE PRODUCTION DATES	POTENTIALLY NUMBER OF UNITS	AFFECTED UNITS ESTIMATED PERCENTAGE OF VEHICLES THAT CONTAIN THE CONDITION
Explorer	FOV	Job1-'99	20.605 *	100%
F-150	FOV	'98 – '99	7.542 *	100%

*This is just an approximation, precise numbers will be given later during the day.

7. AFTERMARKET PARTS

A. The causal part was release on October 1995 until 06/15/99. Ford Motor de Venezuela, S.A. does not stock tires for service. Firestone dealers current ~~stock~~ is unknown.

B. Tires are not stocked by depot or by Ford dealers. Firestone must determine whether they want to purge their inventory of tires at their distribuitor and tire stores in Venezuela, Colombia or Ecuador.

8. ASSESMENT OF EFFECT ON VEHICLE OPERATION

This particular tire failure has resulted in customers loosing control of their vehicles with reported roll over conditions, however, we don't have definite information on the root cause of the accidents.

Roll over conditions are a result of the vehicle going off the road into soft soil conditions, from changing road coefficients of friction (ie, wet to dry) or when the wheel digs into the pavement or ground and the vehicle rolls, or due to an abrupt wheel movement.

9. DESCRIPTION OF CONCERN SOLUTION AND PARTS REQUIREMENTS (FIELD SERVICE ACTIONS)

A. Interim actions:

When a person claimed to have a defect one or more of in their tires, they were instructed to contact the customer service of Firestone (800-FIRESTONE) and they were scheduled an appointment in order to have their five (5) tires changed, by the new "S" speed rated tires. The P255/70 R16 109S and 235/75 R15 Wildnerness Firestone tires were our interim solutions.

The repair instructions are the same as in any other tire replacement.

Short term actions:

The Engineering Department is stuying an introduction of Goodyear tire in order to improve image and customer satisfaction. An ESO is being prepared. All other requirements are completed and have passed.

Vehicles sold between job #1 '96, and Job# 1 '98 will be replacing the five (5) tires. Four of them a full size tire and the spare tire for another Goodyear but R15. On '98 and '99 vehicles we will be replacing all five (5) tires because the spare tire is the same size and construction as the four road tires. We will not be changing tires on any vehicle that comes in that has had the tires changed from Firestone to some other brand tire.

2000 MY Explorer produced in Venezuela and exported to Colombia and Ecuador will be fitted with the Goodyear tires.

Long term actions:

A. No long term prime actions has been assessed yet.

B. Test processes, plant capacity, market wants and other factors will be throughly considered in developing a long term action.
    - The Venezuelan, Colombian and Ecuador market do not want a Firestone tire on the Explorer.

- U152 and all other SUV's should have **Low Tire Pressure Warning** systems release on the engineering system to apply to Venezu Ecuador and Colombia.

10. PROGRAM PARTS SIGN OFF/AVAILABILITY

The parts involved in the interim solution (S rated tires) are readily available in the market and have been PPAP approved for their use on the affected vehicles as of 05/19/99 for the 235/75 R15 and on 05/31/99 for the 255/70 R16 109S.

The Goodyear Wrangler RTS 255/70 R16 (black letters) part number 985K-1508-AA, 255/70 R16 (white letters) part number (TBD.) , 235/75 R15 (white letter) part number F87A-1508-K3B and 235/75 R15 (black letters) part number (TBD) will be release on 08/24/99. The date of availability and fully approved and PPAP is still pending. No tooling is needed for this part number.
Part availability schedule:

(Pending for information)	Parts available in warehouses.

11. SUPPLIER INVOLVEMENT

A. The name of the causal part supplier:
Bridgestone/Firestone Venezolana, C.A.
Carretera Nacional Valencia Los Guayos,
Valencia-Edo. Carabobo.
Venezuela.
Pedro Martinez, Sales Manager for Original parts 011-58-41-407777

B. This condition is component-related, and is specifically related to the customer usage patterns and environmental conditions of the Venezuelan, Colombian and Ecuatorian market.

C. Perceptage of the root cause contributed by the supplied component.

D. Deliver copy of this paper to tire buyer Martin Cadena when completed and approved.
E. Bridgestone / Firestone: LF177 , Prefit code: 6062
GOODYEAR: LG214, Prefit code: 6066
F. Miguel Ruiz MRUIZ2 (Manager) / Martin Cadena MCADENA (Buyer).

G.

12. FINANCIAL IMPLICATIONS

		Vehicle Volume	Cost Per Unit	Total Cost
A	Program Administration Costs			
B	Inspection Costs (Units to be Inspected but Not Modified)			
C	Modification Costs (Units to be Inspected and Modified) • Parts (priced at dealer price plus ——— %) • Labor (1.3 hours x $15.45 labor rate)			
D	Dealer Administration Allowance (for safety and emissions recalls only) [0.1 hours x $—— labor rate N.A.]			
E	Total Cost (total A through D)			
F	Percentage of Recommended Supplier Recovery (if applicable or TBD if unknown)			
G	Supplier Impact (E* F, if applicable)			
H	Net FORD Exposure (E-G)			
I	Potential Warranty Offset			

Purchasing, Engineering, and other appropiate activities will jointly determine the extent of supplier financial responsability. If supplier reimbursement is warranted in the field service action, purchasing will negotiate cost recovery.

13. PREVENT ACTIONS

A. Low inflation operating situation:

- Firestone and Hay Wheels will start an instructive field trip all around Ford dealers in order to teach how to evaluate tires conditions, how to inspect a tire reparation, ect.

.- Low pressure warning device should be release for the application in Venezuela, Colombia and Ecuador for future SUV's, in order to warn customer's of under-inflated tires.

Extended / repeated use at extremely high speed:

.- It should be release by the Product Development Department in the U.S. to apply in the Venezuelan, Colombian and Ecuatorian market the use of a tire with speed rating at least one (1) level higher than the vehicle max speed when adjusted for vehicle recommended tire pressure.

.- Tire should be of a "special service" construction for extreme puncture resistance.

Extended/repeated use at overload conditions:

.- None actions can be taken, only the one's already existing in the owners manual regarding load capacity of the vehicule.

Fatigue failure accelerated by high temperature and ozone:

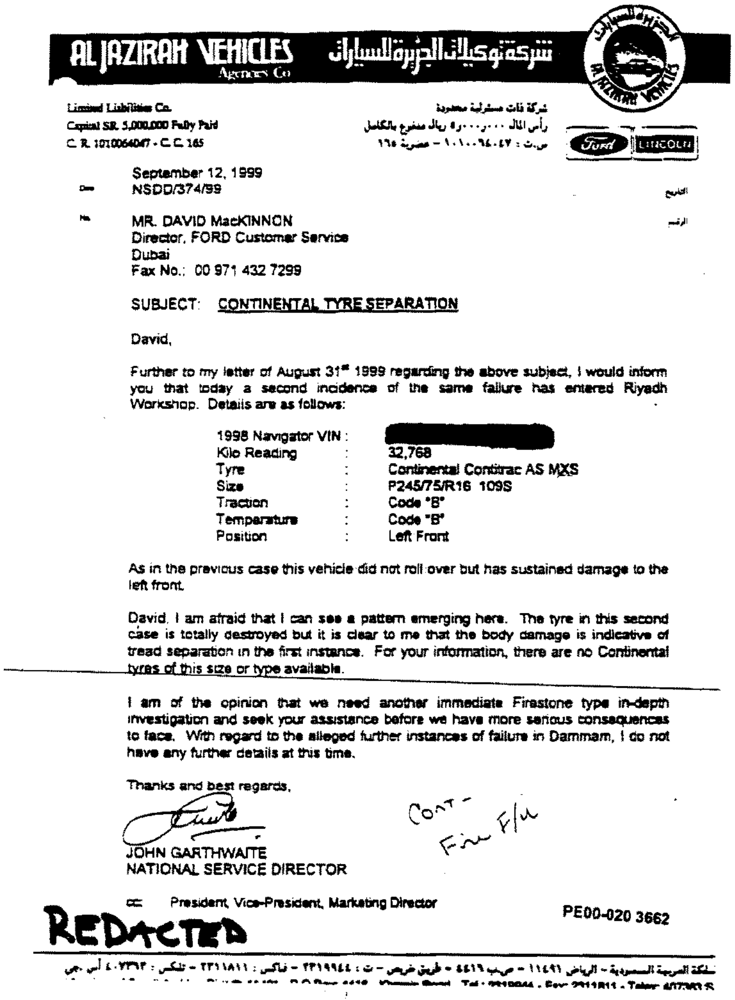
.- It should be design a tire by Ford Product Engineering Department U.S., that could apply to the Venezuelan, Colombian and Ecuatorian market, that will be puncture resistance and heat resistance.

B.

C. We do not have the authority to modify corporate standards.

14. REFERENCE DATA

A. Edivia Caballero, ECABALL1, Service Engineer, 011-58-41-406189, Ford Motor of Venezuela.



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شركة ذات مسئولية محدودة
رأس المال ٥٠٠٠٠٠٠ ريال مدفوع بالكامل
س.ت : ١٠١٠٠٦٤٠٤٧ - عضوية ١٦٥

Ford LINCOLN

Date September 12, 1999 التاريخ
No. NSDD/374/99 الرقم

MR. DAVID MacKINNON
Director, FORD Customer Service
Dubai
Fax No.: 00 971 432 7299

SUBJECT: CONTINENTAL TYRE SEPARATION

David,

Further to my letter of August 31st 1999 regarding the above subject, I would inform you that today a second incidence of the same failure has entered Riyadh Workshop. Details are as follows:

1998 Navigator VIN	:	[redacted]
Kilo Reading	:	32,768
Tyre	:	Continental Contitrac AS MXS
Size	:	P245/75/R16 109S
Traction	:	Code "B"
Temperature	:	Code "B"
Position	:	Left Front

As in the previous case this vehicle did not roll over but has sustained damage to the left front.

David, I am afraid that I can see a pattern emerging here. The tyre in this second case is totally destroyed but it is clear to me that the body damage is indicative of tread separation in the first instance. For your information, there are no Continental tyres of this size or type available.

I am of the opinion that we need another immediate Firestone type in-depth investigation and seek your assistance before we have more serious consequences to face. With regard to the alleged further instances of failure in Dammam, I do not have any further details at this time.

Thanks and best regards,

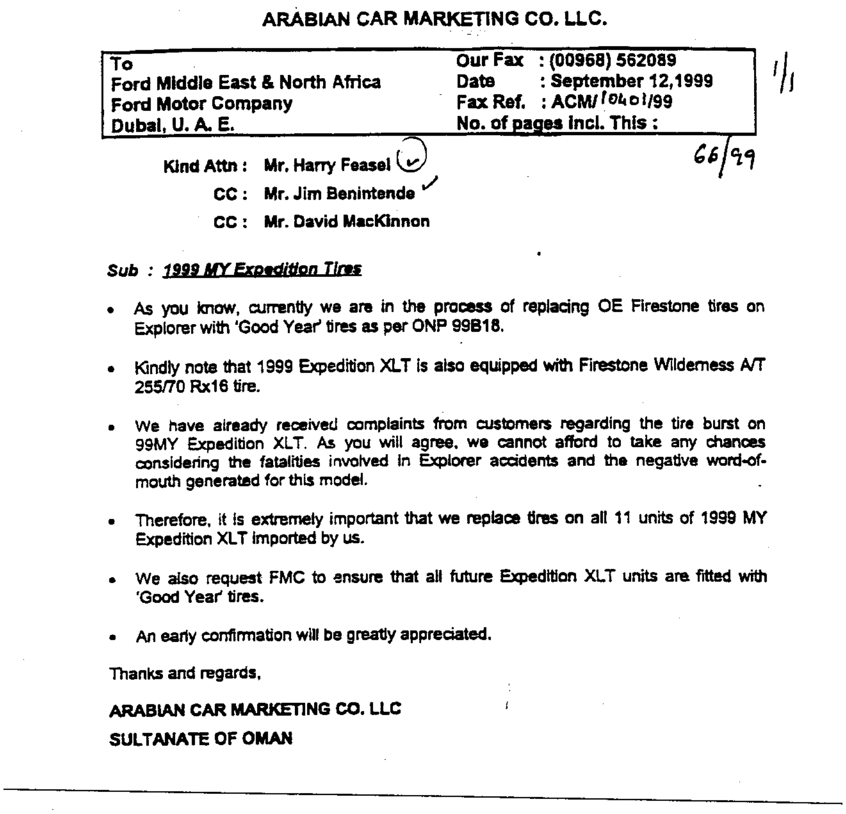
JOHN GARTHWAITE
NATIONAL SERVICE DIRECTOR

Cont - Fire F/u

cc: President, Vice-President, Marketing Director

REDACTED

PE00-020 3662



ARABIAN CAR MARKETING CO. LLC.

To **Ford Middle East & North Africa** **Ford Motor Company** **Dubai, U. A. E.**	**Our Fax : (00968) 562089** **Date : September 12,1999** **Fax Ref. : ACM/10401/99** **No. of pages incl. This :**

1/1

66/99

Kind Attn : Mr. Harry Feasel ✓
CC : Mr. Jim Benintende ✓
CC : Mr. David MacKinnon

Sub : 1999 MY Expedition Tires

- As you know, currently we are in the process of replacing OE Firestone tires on Explorer with 'Good Year' tires as per ONP 99B18.
- Kindly note that 1999 Expedition XLT is also equipped with Firestone Wilderness A/T 255/70 Rx16 tire.
- We have already received complaints from customers regarding the tire burst on 99MY Expedition XLT. As you will agree, we cannot afford to take any chances considering the fatalities involved in Explorer accidents and the negative word-of-mouth generated for this model.
- Therefore, it is extremely important that we replace tires on all 11 units of 1999 MY Expedition XLT imported by us.
- We also request FMC to ensure that all future Expedition XLT units are fitted with 'Good Year' tires.
- An early confirmation will be greatly appreciated.

Thanks and regards,

ARABIAN CAR MARKETING CO. LLC
SULTANATE OF OMAN

1995 / 99 Explorer / Mountaineer Firestone P255/70R16 Tire Separation in the United States

1. PROBLEM DESCRIPTION

While driving vehicle, the tire tread separated from the main carcass of the tire. The tire failure is discovered when the driver hears the tire tread hitting the wheel house or the tire goes flat.

2. PROBLEM STATISTICS (MAGNITUDE OF CONCERN)

A. VOQ (Vehicle Owner Questionnaire)

-VOQ Database is showing 2 reported tire separations on 1996 vehicles. Tire size is TBD on one vehicle because of no VIN number reported and the second vehicle had the P235 tire.
-Two (2) additional tire claims that might be tire separation on 1996 vehicles. Tire size is TBD on one vehicle because of no VIN number reported and the second vehicle had the P235 tire.

B. AWS (Analytical Warranty System)

-Reviewed all 95 / 99 AWS claims (39) for tires with verbatims.

Found no reports of tire separations.

C. CQIS (Common Quality Indicator System)

-Reviewed all 95 / 99 CQIS reports (497) for tires and wheels.

Found one (1) report for Firestone tire separation; on a 1998 vehicle, but it was the Firestone P235/75R15 tire size and not the P255/70R16 tire.

D. MORS (Master Owners Relation System)

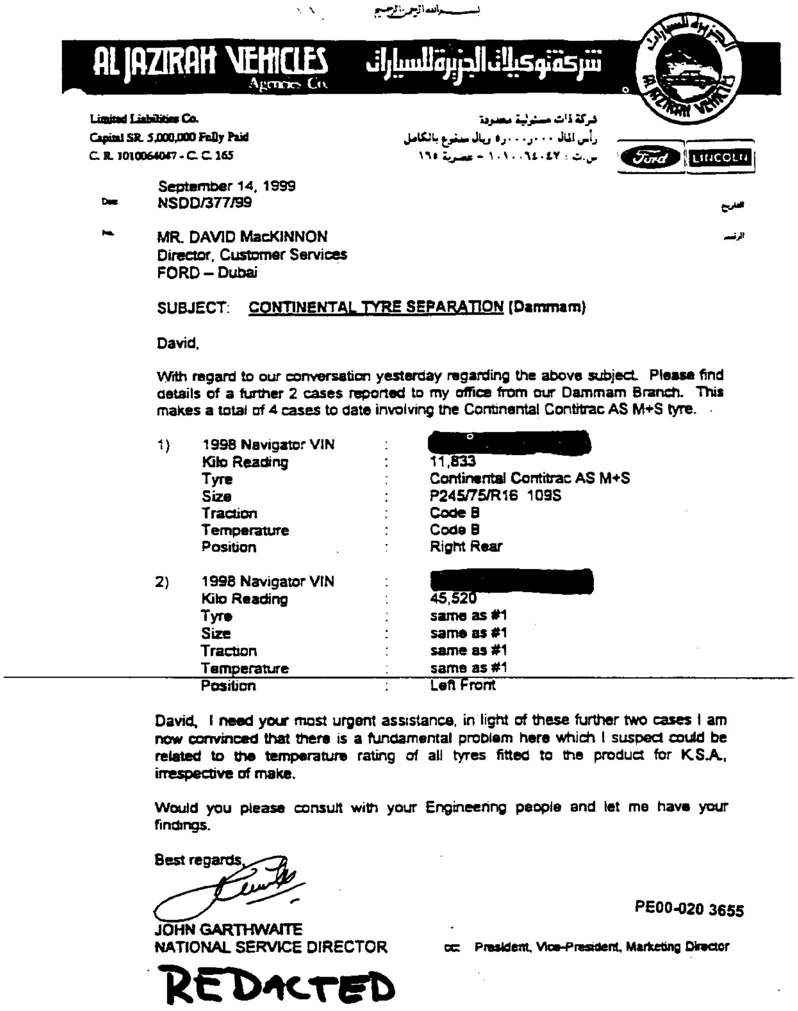
-Reviewed all 95 / 99 MORS reports (4236) for tires and wheels

Found 32 "possible" tread separation claims on Firestone (22) and Goodyear (10)

3 of the 32 possible claims were for the P225/70R15 tire from Firestone
10 of the 32 possible claims were for the P235/75R15 tire from Goodyear
18 of the 32 possible claims were for the P235/75R15 tire from Firestone

Found one (1) possible report for Firestone tire separation on P255/70R16, which sounds like it was caused by driving on a flat tire to the tire store to get air in the tire.

REDACTED



بسم الله الرحمن الرحيم

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شركة ذات مسئولية محدودة
رأس المال ٥٠٠٠٠٠٠ ريال مدفوع بالكامل
س.ت : ١٠١٠٠٦٤٠٤٧ - عضوية ١٦٥

Ford LINCOLN

September 14, 1999
Date NSDD/377/99 التاريخ

Ref MR. DAVID MacKINNON الرقم
Director, Customer Services
FORD – Dubai

SUBJECT: CONTINENTAL TYRE SEPARATION (Dammam)

David,

With regard to our conversation yesterday regarding the above subject. Please find details of a further 2 cases reported to my office from our Dammam Branch. This makes a total of 4 cases to date involving the Continental Contitrac AS M+S tyre.

1) 1998 Navigator VIN : [redacted]
Kilo Reading : 11,833
Tyre : Continental Contitrac AS M+S
Size : P245/75/R16 109S
Traction : Code B
Temperature : Code B
Position : Right Rear

2) 1998 Navigator VIN : [redacted]
Kilo Reading : 45,520
Tyre : same as #1
Size : same as #1
Traction : same as #1
Temperature : same as #1
Position : Left Front

David, I need your most urgent assistance, in light of these further two cases I am now convinced that there is a fundamental problem here which I suspect could be related to the temperature rating of all tyres fitted to the product for K.S.A., irrespective of make.

Would you please consult with your Engineering people and let me have your findings.

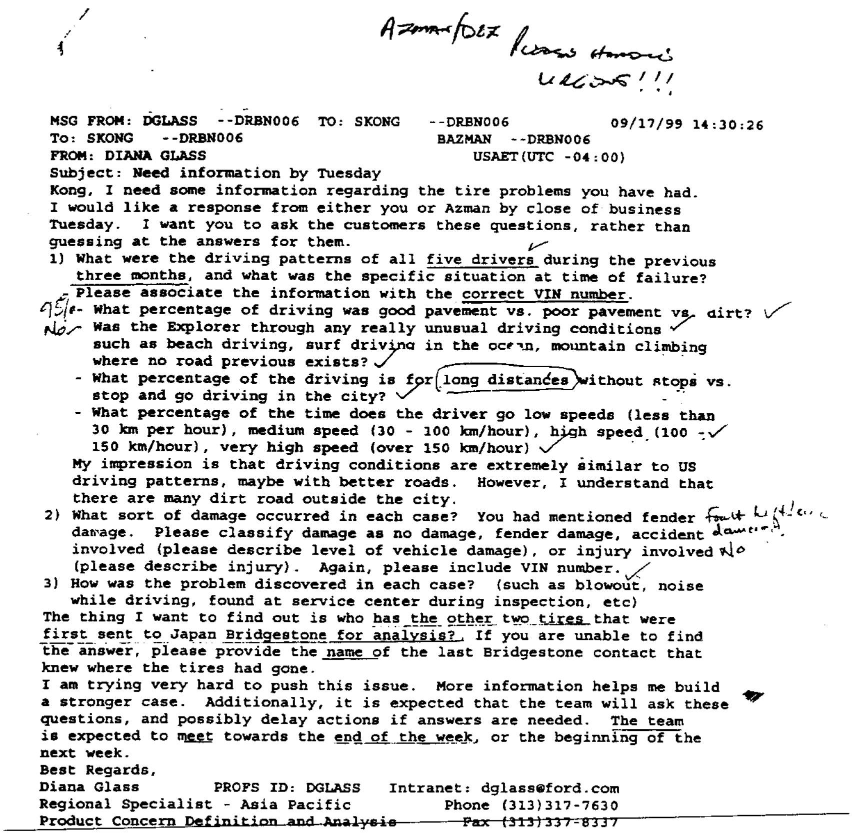
Best regards,

JOHN GARTHWAITE
NATIONAL SERVICE DIRECTOR

PE00-020 3655

cc: President, Vice-President, Marketing Director

REDACTED



Azman/Dez Please answer URGENT!!!

MSG FROM: DGLASS --DRBN006 TO: SKONG --DRBN006 09/17/99 14:30:26
To: SKONG --DRBN006 BAZMAN --DRBN006
FROM: DIANA GLASS USAET(UTC -04:00)
Subject: Need information by Tuesday

Kong, I need some information regarding the tire problems you have had. I would like a response from either you or Azman by close of business Tuesday. I want you to ask the customers these questions, rather than guessing at the answers for them.

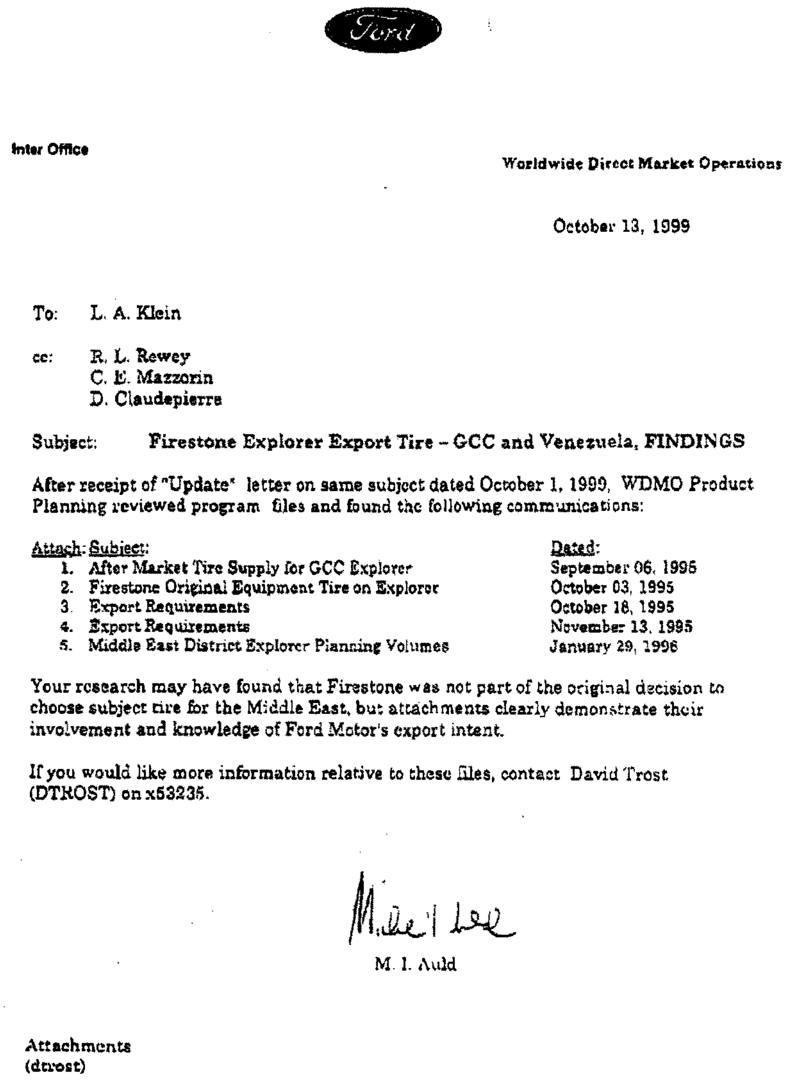
1) What were the driving patterns of all five drivers during the previous three months, and what was the specific situation at time of failure? Please associate the information with the correct VIN number.
   - 95% What percentage of driving was good pavement vs. poor pavement vs. dirt? ✓
   - No Was the Explorer through any really unusual driving conditions such as beach driving, surf driving in the ocean, mountain climbing where no road previous exists? ✓
   - What percentage of the driving is for long distances without stops vs. stop and go driving in the city? ✓
   - What percentage of the time does the driver go low speeds (less than 30 km per hour), medium speed (30 - 100 km/hour), high speed (100 - 150 km/hour), very high speed (over 150 km/hour) ✓

   My impression is that driving conditions are extremely similar to US driving patterns, maybe with better roads. However, I understand that there are many dirt road outside the city.
2) What sort of damage occurred in each case? You had mentioned fender damage. Please classify damage as no damage, fender damage, accident involved (please describe level of vehicle damage), or injury involved (please describe injury). Again, please include VIN number. ✓ Front left [illegible] damaged. No
3) How was the problem discovered in each case? (such as blowout, noise while driving, found at service center during inspection, etc)

The thing I want to find out is who has the other two tires that were first sent to Japan Bridgestone for analysis? If you are unable to find the answer, please provide the name of the last Bridgestone contact that knew where the tires had gone.

I am trying very hard to push this issue. More information helps me build a stronger case. Additionally, it is expected that the team will ask these questions, and possibly delay actions if answers are needed. The team is expected to meet towards the end of the week, or the beginning of the next week.

Best Regards,
Diana Glass PROFS ID: DGLASS Intranet: dglass@ford.com
Regional Specialist - Asia Pacific Phone (313)317-7630
Product Concern Definition and Analysis Fax (313)337-8337



Inter Office

Worldwide Direct Market Operations

October 13, 1999

To: L. A. Klein

cc: R. L. Rewey
C. E. Mazzorin
D. Claudepierre

Subject: **Firestone Explorer Export Tire – GCC and Venezuela, FINDINGS**

After receipt of "Update" letter on same subject dated October 1, 1999, WDMO Product Planning reviewed program files and found the following communications:

Attach:	Subject:	Dated:
1.	After Market Tire Supply for GCC Explorer	September 06, 1995
2.	Firestone Original Equipment Tire on Explorer	October 03, 1995
3.	Export Requirements	October 18, 1995
4.	Export Requirements	November 13, 1995
5.	Middle East District Explorer Planning Volumes	January 29, 1996

Your research may have found that Firestone was not part of the original decision to choose subject tire for the Middle East, but attachments clearly demonstrate their involvement and knowledge of Ford Motor's export intent.

If you would like more information relative to these files, contact David Trost (DTROST) on x53235.

M. I. Auld

Attachments
(dtrost)

Worldwide Export Operations **Attachment 1**

ATTACHMENT 5 (CONT'd)

MIDDLE EAST DISTRICT

After Market Replacement Tire Support

Explorer Planning Volume

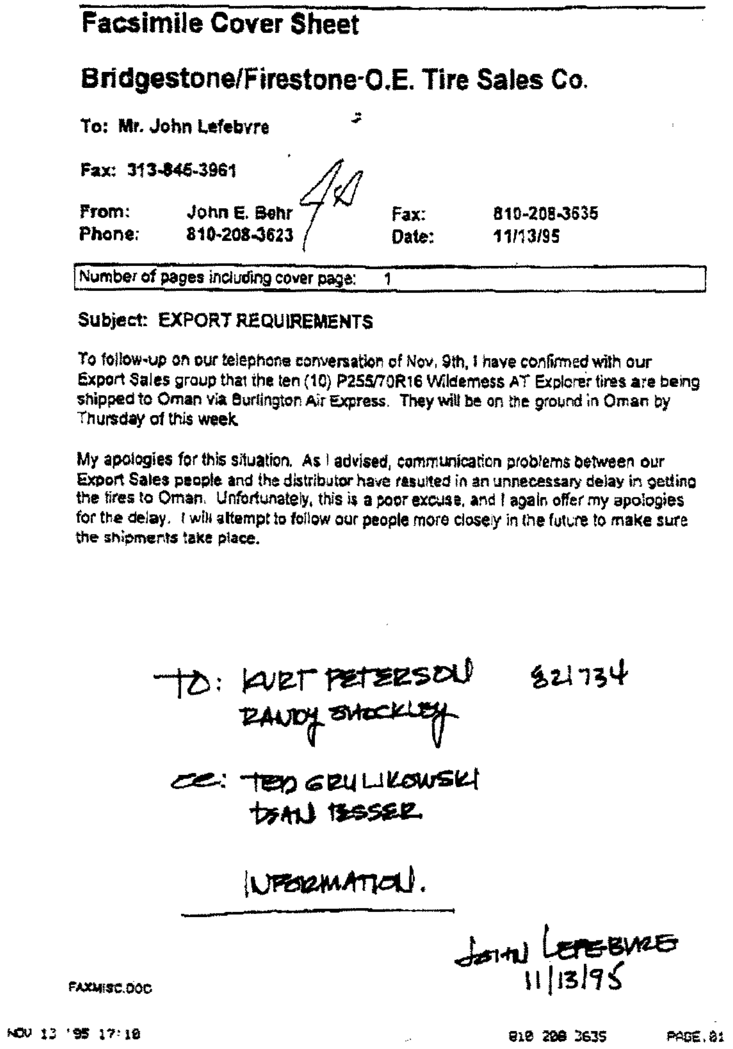
Market	Calendar Year 1996	1997	1998	1999	2000
* Saudi Arabia	370	710	855	910	990
Kuwait	150	155	160	165	170
UAE	210	220	225	230	235
Oman	260	270	275	280	290
Qatar	42	44	46	48	50
Bahrain	47	48	50	52	54
Egypt	-	-	-	-	-
Jordan	15	20	25	26	27
Lebanon	yes	yes	yes	yes	yes
Syria	yes	yes	yes	yes	yes
Yemen	24	25	26	27	28

Notes:
(1) P255/70Rx16 OWL All-Terrain tires are standard and mandatory for all markets in the Middle East.
(2) * - Includes Mountaineer volume (same tires). Mountaineer is available in Saudi Arabia only.
(3) Explorer currently not planned for distribution in Egypt however please provide local Firestone distrib.
(4) No planning volumes available for Lebanon/Syria however Explorer is available to these markets.

1/29/96

Product Planning
J. B. Lefebvre

ATTACHMENT 4



Facsimile Cover Sheet

Bridgestone/Firestone-O.E. Tire Sales Co.

To: Mr. John Lefebvre

Fax: 313-845-3961

From:	John E. Behr	**Fax:**	810-208-3635
Phone:	810-208-3623	**Date:**	11/13/95

Number of pages including cover page: 1

Subject: EXPORT REQUIREMENTS

To follow-up on our telephone conversation of Nov. 9th, I have confirmed with our Export Sales group that the ten (10) P255/70R16 Wilderness AT Explorer tires are being shipped to Oman via Burlington Air Express. They will be on the ground in Oman by Thursday of this week.

My apologies for this situation. As I advised, communication problems between our Export Sales people and the distributor have resulted in an unnecessary delay in getting the tires to Oman. Unfortunately, this is a poor excuse, and I again offer my apologies for the delay. I will attempt to follow our people more closely in the future to make sure the shipments take place.

TO: KURT PETERSON 821734
RANDY SHOCKLEY

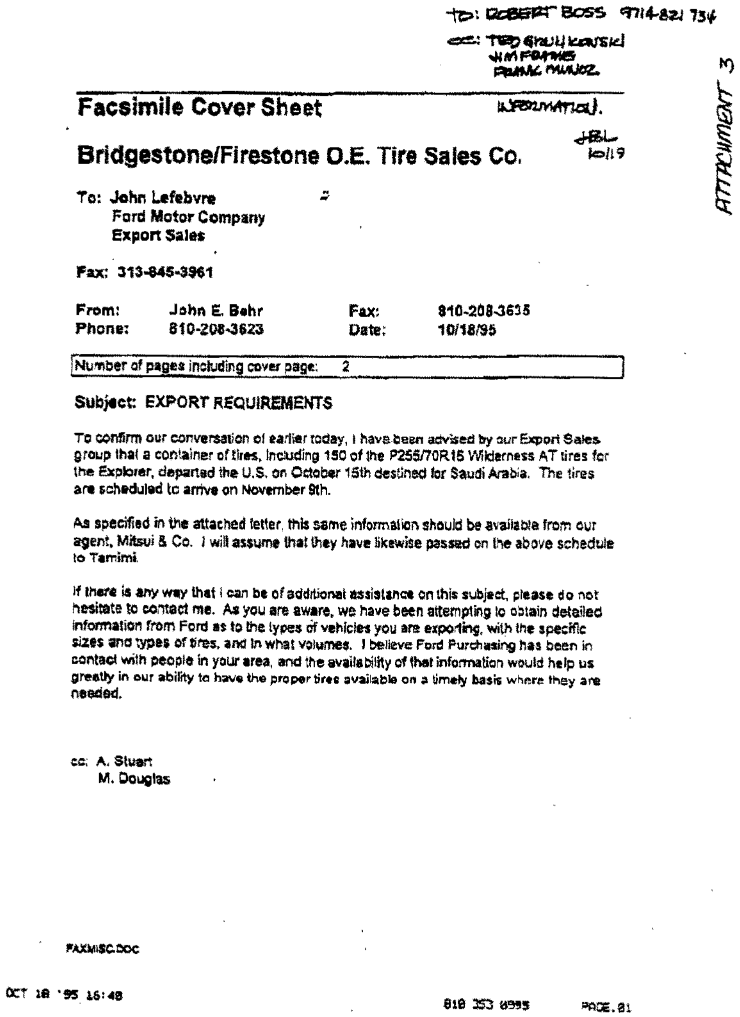
cc: TED GRULIKOWSKI
DEAN TESSER

INFORMATION.

JOHN LEFEBVRE
11/13/95

FAXMISC.DOC

NOV 13 '95 17:10 810 208 3635 PAGE.01



TO: ROBERT BOSS 9714-821 734

cc: TED GRULIKOWSKI
JIM FRAME
FRANK MUNOZ

ATTACHMENT 3

Facsimile Cover Sheet

INFORMATION.

Bridgestone/Firestone O.E. Tire Sales Co.

JBL
10/19

To: **John Lefebvre**
Ford Motor Company
Export Sales

Fax: **313-845-3961**

From:	John E. Behr	**Fax:**	810-208-3635
Phone:	810-208-3623	**Date:**	10/18/95

Number of pages including cover page: 2

Subject: EXPORT REQUIREMENTS

To confirm our conversation of earlier today, I have been advised by our Export Sales group that a container of tires, including 150 of the P255/70R15 Wilderness AT tires for the Explorer, departed the U.S. on October 15th destined for Saudi Arabia. The tires are scheduled to arrive on November 9th.

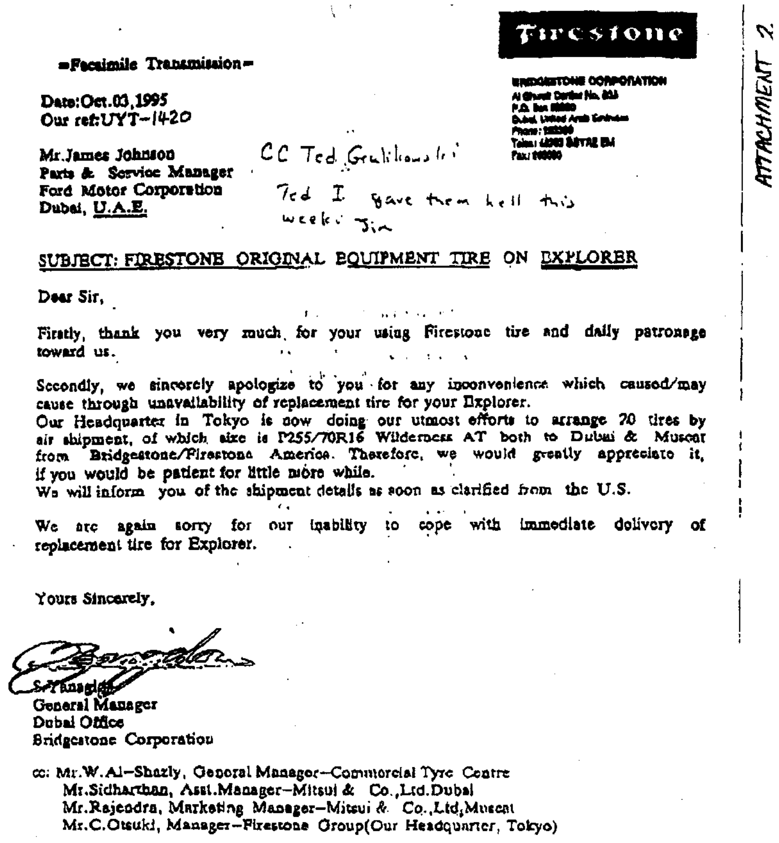
As specified in the attached letter, this same information should be available from our agent, Mitsui & Co. I will assume that they have likewise passed on the above schedule to Tamimi.

If there is any way that I can be of additional assistance on this subject, please do not hesitate to contact me. As you are aware, we have been attempting to obtain detailed information from Ford as to the types of vehicles you are exporting, with the specific sizes and types of tires, and in what volumes. I believe Ford Purchasing has been in contact with people in your area, and the availability of that information would help us greatly in our ability to have the proper tires available on a timely basis where they are needed.

cc: A. Stuart
M. Douglas

FAXMISC.DOC

OCT 18 '95 16:48 810 353 0335 PAGE.01



ATTACHMENT 2

Firestone

BRIDGESTONE CORPORATION
Al Ghurair Center No. [illegible]
P.O. Box [illegible]
Dubai, United Arab Emirates
Phone: [illegible]
Telex: [illegible] BSTRE EM
Fax: [illegible]

=Facsimile Transmission=

Date:Oct.03,1995
Our ref:UYT-1420

Mr.James Johnson
Parts & Service Manager
Ford Motor Corporation
Dubai, U.A.E.

CC Ted Grabikowski

Ted I gave them hell this week. Jim

SUBJECT: FIRESTONE ORIGINAL EQUIPMENT TIRE ON EXPLORER

Dear Sir,

Firstly, thank you very much for your using Firestone tire and daily patronage toward us.

Secondly, we sincerely apologize to you for any inconvenience which caused/may cause through unavailability of replacement tire for your Explorer.
Our Headquarter in Tokyo is now doing our utmost efforts to arrange 70 tires by air shipment, of which size is P255/70R16 Wilderness AT both to Dubai & Muscat from Bridgestone/Firestone America. Therefore, we would greatly appreciate it, if you would be patient for little more while.
We will inform you of the shipment details as soon as clarified from the U.S.

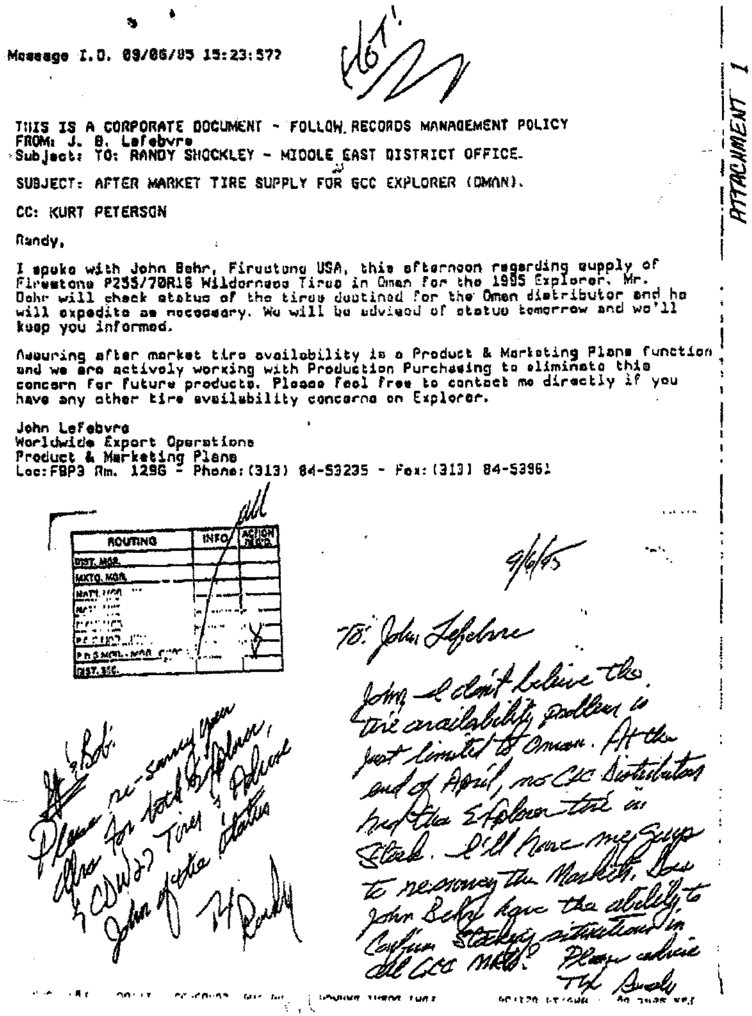
We are again sorry for our inability to cope with immediate delivery of replacement tire for Explorer.

Yours Sincerely,

S.Yanagida
General Manager
Dubai Office
Bridgestone Corporation

cc: Mr.W.Al-Shazly, General Manager-Commercial Tyre Centre
Mr.Sidharthan, Asst.Manager-Mitsui & Co.,Ltd.Dubai
Mr.Rajendra, Marketing Manager-Mitsui & Co.,Ltd,Muscat
Mr.C.Otsuki, Manager-Firestone Group(Our Headquarter, Tokyo)

1/1



Hot!

Message I.D. 09/06/95 15:23:57?

ATTACHMENT 1

THIS IS A CORPORATE DOCUMENT - FOLLOW RECORDS MANAGEMENT POLICY
FROM: J. B. Lefebvre
Subject: TO: RANDY SHOCKLEY - MIDDLE EAST DISTRICT OFFICE.

SUBJECT: AFTER MARKET TIRE SUPPLY FOR GCC EXPLORER (OMAN).

CC: KURT PETERSON

Randy,

I spoke with John Behr, Firestone USA, this afternoon regarding supply of Firestone P235/70R16 Wilderness Tires in Oman for the 1995 Explorer. Mr. Behr will check status of the tires destined for the Oman distributor and he will expedite as necessary. We will be advised of status tomorrow and we'll keep you informed.

Assuring after market tire availability is a Product & Marketing Plans function and we are actively working with Production Purchasing to eliminate this concern for future products. Please feel free to contact me directly if you have any other tire availability concerns on Explorer.

John Lefebvre
Worldwide Export Operations
Product & Marketing Plans
Loc:FBP3 Rm. 129G - Phone:(313) 84-53235 - Fax:(313) 84-53961

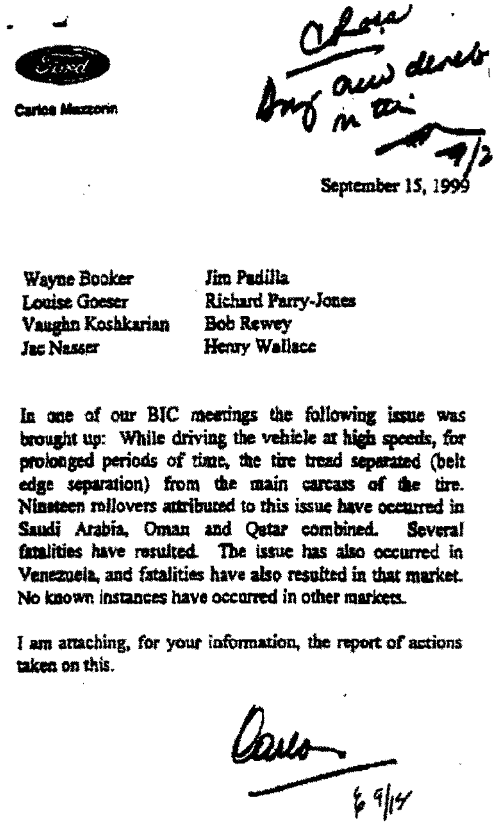
ROUTING	INFO	ACTION REQ'D.
DIST. MGR.		
MKTG. MGR.		
[illegible]		
[illegible]		
[illegible]		
[illegible]		✓
P.D.S MGR. [illegible]		
DIST. SEC.		

9/6/95

To: John Lefebvre

John I don't believe the tire availability problem is just limited to Oman. At the end of April, no GCC distributors had the Explorer tire in stock. I'll have my Supp to re-survey the Market. Does John Behr have the ability to confirm stocking situations in all GCC Mkts? Please advise
Tk Randy

Bob:
Please re-survey your Area for stock of Explorer, & CDW27 Tires & Advise John of the status
Tk Randy



Carlos Mazzorin

Close
Any new devel in this
9/2

September 15, 1999

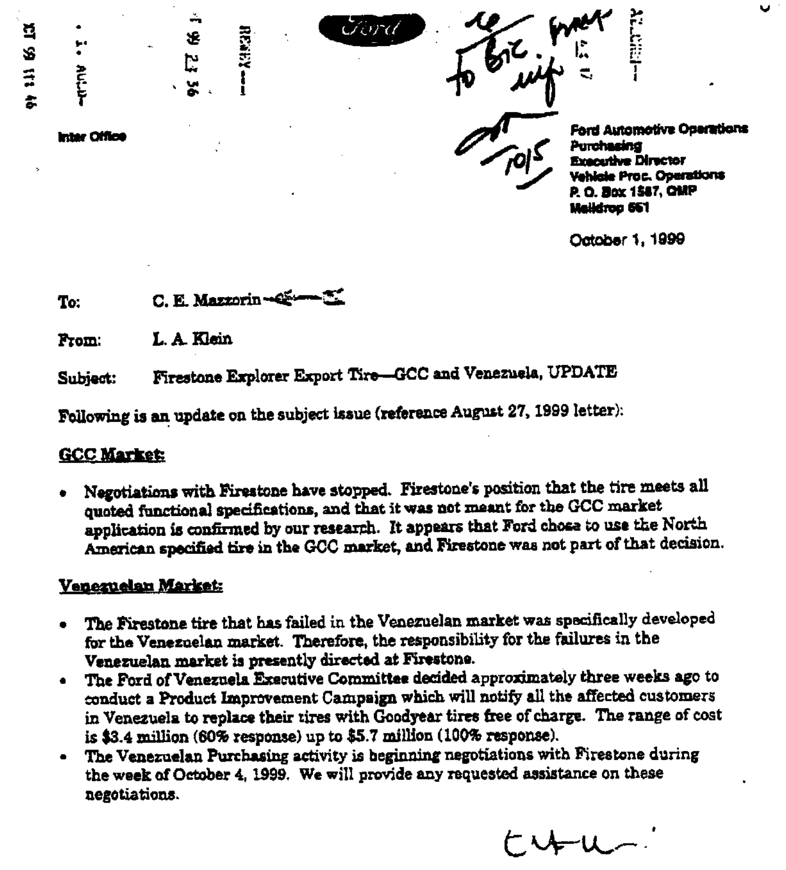
Wayne Booker	Jim Padilla
Louise Goeser	Richard Parry-Jones
Vaughn Koshkarian	Bob Rewey
Jac Nasser	Henry Wallace

In one of our BIC meetings the following issue was brought up: While driving the vehicle at high speeds, for prolonged periods of time, the tire tread separated (belt edge separation) from the main carcass of the tire. Nineteen rollovers attributed to this issue have occurred in Saudi Arabia, Oman and Qatar combined. Several fatalities have resulted. The issue has also occurred in Venezuela, and fatalities have also resulted in that market. No known instances have occurred in other markets.

I am attaching, for your information, the report of actions taken on this.

Carlos

9/14



to Eric [illegible]

10/5

Inter Office

Ford Automotive Operations
Purchasing
Executive Director
Vehicle Proc. Operations
P. O. Box 1587, CMP
Maildrop 661

October 1, 1999

To: C. E. Mazzorin

From: L. A. Klein

Subject: Firestone Explorer Export Tire—GCC and Venezuela, UPDATE

Following is an update on the subject issue (reference August 27, 1999 letter):

GCC Market:

- Negotiations with Firestone have stopped. Firestone's position that the tire meets all quoted functional specifications, and that it was not meant for the GCC market application is confirmed by our research. It appears that Ford chose to use the North American specified tire in the GCC market, and Firestone was not part of that decision.

Venezuelan Market:

- The Firestone tire that has failed in the Venezuelan market was specifically developed for the Venezuelan market. Therefore, the responsibility for the failures in the Venezuelan market is presently directed at Firestone.
- The Ford of Venezuela Executive Committee decided approximately three weeks ago to conduct a Product Improvement Campaign which will notify all the affected customers in Venezuela to replace their tires with Goodyear tires free of charge. The range of cost is $3.4 million (60% response) up to $5.7 million (100% response).
- The Venezuelan Purchasing activity is beginning negotiations with Firestone during the week of October 4, 1999. We will provide any requested assistance on these negotiations.

Inter Office

Ford Automotive Operations
Purchasing
Executive Director
Vehicle Proc. Operations
P. O. Box 1587, GMP
Maildrop 661

August 27,1999

To: C. E. Mazzorin

From: L. A. Klein

Subject: Firestone Explorer Export Tire—GCC and Venezuela

Following is the background, current state and next steps regarding the subject tire.

Background

Issue description: While driving the vehicle at high speeds, for prolonged periods of time, the tire tread separated (belt edge separation) from the main carcass of the tire. 19 rollovers attributed to this issue have occurred in Saudi Arabia, Oman and Qatar combined. Several fatalities have resulted. The issue has also occurred in Venezuela, and fatalities have also resulted in that market. No known instances have occurred in other markets.

Root cause has not been identified, because it has not been possible to replicate the issue in a test environment.

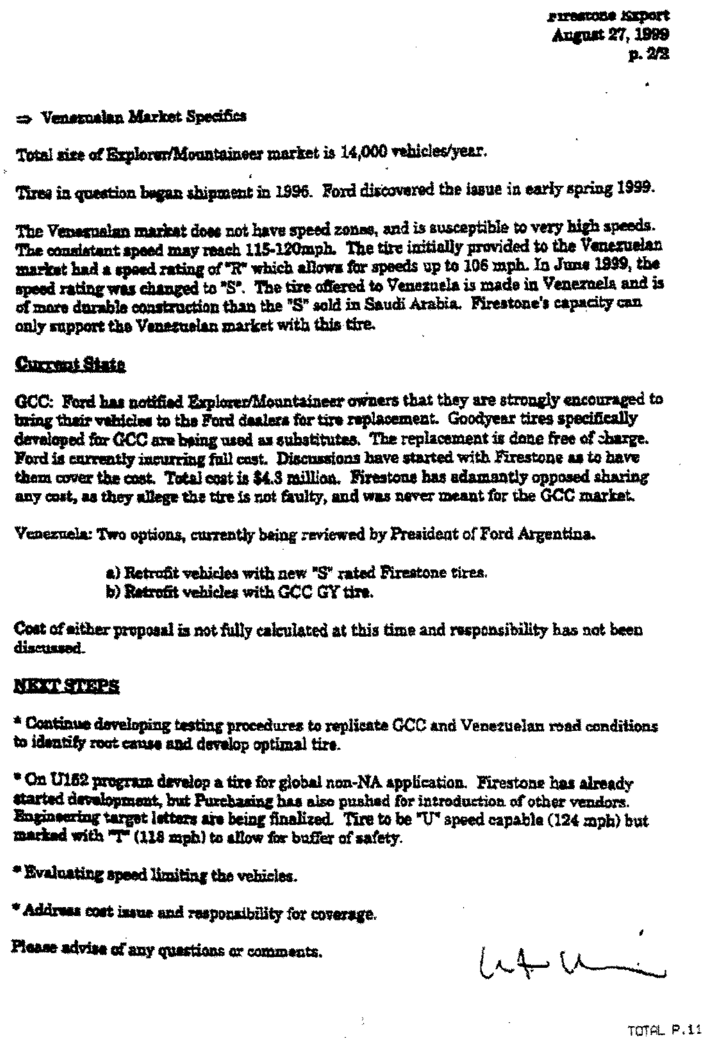
⇒ GCC Market Specifics

Total Explorer/ Mountaineers sold from 1995-1999 was 6,755 units.

Year around hot temperatures (exceeding 115 F in the summer months), and excellent highway areas without speed zones, which allow for 100 mph cruising for several hours at a time.

The tire was not developed for the Middle East application. Speed rating has been "S", which allows for speeds up to 112 mph. The Middle East application would require several unique characteristics: higher speed ratings ("T" minimum); light truck tread compound as opposed to low rolling resistance passenger car construction which will make it more resistant to puncture; reduced skid so it runs cooler and does not last as long (chip tear resistance). Time and temperature are attributes to degradation.

Tires in question began shipment to GCC in 1995. Ford first became aware of the issue in GCC markets in December 1998. Several meetings by WDMO and Firestone representatives and visits to GCC market followed to evaluate the situation, culminating in "current state and next actions" below.



Firestone Export
August 27, 1999
p. 2/2

⇒ Venezuelan Market Specifics

Total size of Explorer/Mountaineer market is 14,000 vehicles/year.

Tires in question began shipment in 1996. Ford discovered the issue in early spring 1999.

The Venezuelan market does not have speed zones, and is susceptible to very high speeds. The consistant speed may reach 115-120mph. The tire initially provided to the Venezuelan market had a speed rating of "R" which allows for speeds up to 106 mph. In June 1999, the speed rating was changed to "S". The tire offered to Venezuela is made in Venezuela and is of more durable construction than the "S" sold in Saudi Arabia. Firestone's capacity can only support the Venezuelan market with this tire.

Current State

GCC: Ford has notified Explorer/Mountaineer owners that they are strongly encouraged to bring their vehicles to the Ford dealers for tire replacement. Goodyear tires specifically developed for GCC are being used as substitutes. The replacement is done free of charge. Ford is currently incurring full cost. Discussions have started with Firestone as to have them cover the cost. Total cost is $4.3 million. Firestone has adamantly opposed sharing any cost, as they allege the tire is not faulty, and was never meant for the GCC market.

Venezuela: Two options, currently being reviewed by President of Ford Argentina.

a) Retrofit vehicles with new "S" rated Firestone tires.
b) Retrofit vehicles with GCC GY tire.

Cost of either proposal is not fully calculated at this time and responsibility has not been discussed.

NEXT STEPS

* Continue developing testing procedures to replicate GCC and Venezuelan road conditions to identify root cause and develop optimal tire.

* On U152 program develop a tire for global non-NA application. Firestone has already started development, but Purchasing has also pushed for introduction of other vendors. Engineering target letters are being finalized. Tire to be "U" speed capable (124 mph) but marked with "T" (118 mph) to allow for buffer of safety.

* Evaluating speed limiting the vehicles.

* Address cost issue and responsibility for coverage.

Please advise of any questions or comments.

3. **PROBLEM INVESTIGATION/VERIFICATION DATA**

A. Lab tests - None

B. Vehicle tests - None

C. Plant/supplier reports - Supplier (Bridgestone/Firestone) has been contacted in Japan and U.S. on Malaysia and Thailand incidents. Ford Explorer OPD Engineering has been contacted on Malaysia and Thailand incidences.

D. Quality Indicator System - Two (2) reported CQIS reports have been received on Malaysia incidents. Most incidences reported thru Region Specialist - Asia Pacific.

E. Field reports - 13 from Malaysia and Thailand
6 from Malaysia
7 from Thailand

F. Parts sales — Tires are not sold thru Ford dealers. Therefore no service parts count is available on problem tires.

G. Number of accidents/fines and injuries: 0 accidents in Malaysia and Thailand
0 fatalities, 0 major injuries, 0 minor injuries

4. **ACTIONS TAKEN IN PRODUCTION; INTERIM (CONTAINMENT) AND/OR PERMANENT**

A. Corrective actions – None. 2000 MY Explorer is not currently being shipped to Malaysia or Thailand.

B. Notification – None.

C. Provide WERS alert number - None.

D. Component batch issues – None.

5. VERIFY EFFECTIVENESS OF CORRECTIVE ACTIONS

A. A. None at this time.

6. ESTIMATED PRODUCTION AND PROBLEM STATISTICS (MAGNITUDE OF CONCERN)

A. Production Involved

VEHICLES AFFECTED (BY MODEL AND MODEL YEAR)	ASSEMBLY PLANTS* (INCLUDING KNOCK DOWN OPERATIONS)	VEHICLE PRODUCTION DATES		POTENTIALLY AFFECTED UNITS	
		FROM	UP TO AND INCLUDING	NUMBER OF UNITS	ESTIMATED PERCENTAGE OF VEHICLES THAT CONTAIN THE CONDITION
1997 Explorer	LAP	8/1/96	7/30/97	0	N/A %
1997 Explorer	SLAP	8/1/96	7/30/97	386	0 %
2000 Explorer	SLAP	8/1/99	7/30/00	6	0 %

B. Diana Glass - Region Specialist - Asia Pacific

7. AFTERMARKET PARTS

A. Released for Service: part is released for service but Ford does not stock any tires for service.

B. Tires are not stocked by depot or by Ford dealers. Firestone must determine whether they want to purge their inventory of tires at their distributor and tire stores in these export regions.

8. ASSESSMENT OF EFFECT ON VEHICLE OPERATION

In the event that a tire tread separates while the vehicle is traveling at extremely high rates of speed, the driver will likely have reduced or complete loss of steering control. At these rates of speed a loss of control will likely cause a collision or tripping of the vehicle when it leaves the roadway resulting in a rollover.

9. DESCRIPTION OF CONCERN SOLUTION AND PARTS REQUIREMENTS (FIELD SERVICE ACTIONS)

Short Term Actions:

A. Explorer OPD Chassis Engrg. will be proving out one Goodyear tire made in Malaysia. Vehicle Development will complete their ride and handling evaluations of the Goodyear 235/75R15 A/T BSW Wrangler RT/S in 4-5 weeks All other requirements are pending.

We will be re-flashing the engine controller to lower the top speed of the vehicle from 106 mph to 99 mph. This will put the vehicle top speed one T&RA speed step (6mph) below the tires speed capability.

On '97 vehicles we will be replacing the 5 Firestone tires with 5 Goodyear tires.

2000 MY Explorers will NOT be exported to Malaysia and Thailand because of the high import tariffs put on these vehicles in 1998.

Long Term Actions:

A. No long term prime action has been assessed yet.

B. Test processes, plant complexity, market wants and other factors will be thoroughly considered in developing a long term action.

10. PROGRAM PARTS SIGN OFF/AVAILABILITY

Goodyear Wrangler RT/S tire 235/75R15 A/T BSW part number -1508- (DOT code ???) is available and fully approved as an after market tire. This tire does not have a Ford PPAP approval. No tooling is needed for this part number.

Part availability schedule:

-1508-	5,000 parts available in warehouses in Malaysia

11. SUPPLIER INVOLVEMENT (if applicable)

A. The name of the causal part supplier:

Bridgestone / Firestone, Inc.
One Towne Square, Suite 1470
Southfield, MI 48076-3705
John Behr, Account Executive 248-208-3623

B. This condition is component-related, and is specifically related to the unique customer usage patterns and environmental conditions of the Persian Gulf Coast States.

C. Percentage of the root cause contributed by the supplied component - TBD

D. Do NOT deliver copy of this paper to tire buyer George Coundouriotis when completed and approved.

E. Manufacturing site code for the responsible supplier location - F593A.

F. Judith Sullivan JSULLIV4 x-47679 (Manager) / George Coundouriotis GCOUNDOU x-46803 (Buyer). Ford STA field engineer for Firestone is Lewis Garcia LGARCIA3 at 313-248-6211.

G. At the time of Advice of Field Service Action is approved, the engineer must forward the revised Field Service Action Evaluation paper to the FAO Controllers Office (QMP, MD626, PO. 1587A, Room 486) in North America, or to GB-15/4B-E15 in Europe.

12. FINANCIAL IMPLICATIONS

A. **Note:** If assistance is needed, contact the **Ford Customer Service Division, Recalls & Service Programs (For Europe: Room GB-1/329, Telephone: 8734-2049, for North America, DSC II, Room 785, 24-88817).**

		Vehicle Volume	Cost Per Unit	Total Cost (000)
A	Program Administration Costs	386	$0.65	$0.251
B	Inspection Costs (Units to be Inspected but Not Modified) . Labor (0.2 hours x $60.17)	0	$12.03	$0
C	Modification Costs(Units to be Inspected and Modified)			
	• Parts (priced at dealer price $84 plus __40__%) =	386	$560.00	$216.160
	$112x5=$560	386@0.4x60.17	$24.07	$9.290
	• Labor (1.5 hours x $60.17)	386@1.5x60.17	$90.26	$34.838
D	NGS Cards and Flash Cables			$7.500
E	Dealer Administration Allowance (for safety and emissions recalls only) [0.1 hours x $ $60.17 labor rate – N.A.]	0	$6.02	$0
F	Total Cost (total A through E)	386	$694.40	$268.039
G	Percentage of Recommended Supplier Recovery (if applicable or TBD if unknown)			% __TBD__
H	Supplier Impact (E * F, if applicable)			TBD
I	Net FORD Exposure (E-G)			$268.039
J	Potential Warranty Offset	386	$0.00	$0

urchasing, Engineering, and other appropriate activities will jointly determine the extent of supplier nancial responsibility. If supplier reimbursement is warranted in the field service action, purchasing ·ill negotiate cost recovery.

13. PREVENT ACTIONS

A. Low inflation operating situation -

- Low pressure warning device (part of IVD) is being recommended for future SUV's (U152, U231, U222) going to this region to warn customer's of under-inflated tires.

Extended/repeated use at extremely high speed -

- Tire SDS, ES spec and WDMO/EEME Regulations to be modified to include the following for SUV's going to Malaysia and Thailand markets:

  -Use tire with speed rating at least one (1) level higher than the vehicle max speed when adjusted for vehicle recommended tire pressure. If this tire construction does not exist, then speed limit the vehicle to one speed level (6mph) below the tires speed capability when adjusted for vehicle recommended tire pressure.

  OR

  - Tire should have a minimum of a "A" temperature rating by the UTQG system.

  AND

  -Tire should be of a "special service" construction for extreme puncture resistance.

Fatigue failure accelerated by high temperature and ozone-

- RVT to establish a test procedure to determine minimum tire requirement for this market. Test will be added to tire SDS and ES Spec. Test availability is scheduled for March 1, 2000 completion.
- Tire design failure mode and affects analysis (DFMEA) needs to be updated with this new failure mode and test requirement above once established.
- New programs (including U152) will meet new SDS requirement for spare tire cannot exceed 63C (145F). U152 is shielding exhaust pipe and tire with a heat shield.

B. Identify how "generic" items or processes could be impacted similarly and how such impact will be prevented.

C. State what "Corporate Memory" Documents (e.g., Engineering Design Standards, World Class Requirements, FMEA, etc.) have been or will be updated to provide guidance for future campaign prevention. Include the scheduled or actual timing for the above actions.

14. **REFERENCE DATA**

A. Presenter - Allan Rauner, ARAUNER, 59-42821, Explorer Chassis OPD.

B. Each page of the evaluation paper should indicate "Draft of (Date)." Draft papers should not be stamped with a "Record Copy" retention stamp.

C. When programs are recommended for implementation by the Field Review Committee, the reporting organization is to incorporate any changes in the draft paper recommended by the FRC and within two weeks, submit the final paper to the Secretary of the FRC for filing (For North America , Diagnostic Service Center II, Suite 785, for Europe, Room G-1/329, Recall and Service Programs, FCSD-E).

1997 Explorer P235/75R15 Tire Separation in Malaysia and Thailand

Draft of 1/27/2000

FIELD SERVICE ACTION EVALUATION PAPER (14D) TRANSMITTAL

FIELD REVIEW COMMITTEE

00835

To: (North America)
Secretary, FRC
Suite 785
Diagnostic Service Center II
Ford Customer Service Division — North America

To: (Europe)
Secretary, FRC
Room GB-1/329,
Ford Customer Service Division — Europe

The attached Evaluation Paper is being forwarded for review by the Field Review Committee. Copies have been submitted for review to:

Office of the General Counsel: YES ☐ NO ☐

Vehicle Environmental Engineering: YES ☐ NO ☐

Automotive Safety Office: YES ☐ NO ☐

VC Purchasing Director YES ☐ NO ☐

Subject: **1997 Explorer P235/75R15 Tire Separation in Malaysia and Thailand**

Approve: D. D. Claudepierre
Vehicle Line Director
1/28/00
Date

Approve: N. Kazan for T. D. Baughman
Vehicle Center Engineering Director
2/2/00
Date

Approve: A. O'Neill
FCSD Vehicle & Service Programs Director
22 Feb '00.
Date

Note: Both Vehicle Line Director and VC Engineering Director signatures are required prior to Review by the Field Review Committee.

1997 Explorer P235/75R15 Tire Separation in Malaysia and Thailand

Draft of 2/11/2000

1. **PROBLEM DESCRIPTION** (what/when/extent)

A. While driving vehicle, the tire tread separated (belt edge separation) from the main carcass of the tire. The tire failure is discovered when the driver hears the tire tread hitting the wheel house or the tire goes flat.

Incidences caused by tire tread separation:

13 incidences caused by tire tread separation have been reported in Malaysia (6) and Thailand (7) combined.

- These failures have been on '97 vehicles, all at mileages between 16,500 km and 55,500 km (10,250 - 34,500 miles).

- 2 of the 13 incidences were caused by punctures or severe tread cut around complete tire.

- There have been 2 reported accidents or rollovers associated with these 13 incidences of tread separation.

B. Firestone P235/75R15 A/T ROWL tire, part # F77A-1508-MA, construction code ST381J, date codes on tires built between 12/25/96 and 2/7/97for Malaysia vehicles and between 1/21/97 and 4/7/97 for Thailand vehicles. This tire size and construction is the standard size tire on exported Explorer's to Malaysia and Thailand.

C. Vehicles Affected:

Model Year (s)	Vehicle Lines	Vehicle Volume	Variants	Other Limiting Factors
Malaysia 1997	Explorer	109	4X4, 4 dr, 4.0L, Auto	P235/75R15 A/T ROWL tire
Thailand 1997	Explorer	207 316	4X4, 4 dr, 4.0L, Auto	P235/75R15 A/T ROWL tire

D. Markets Affected: Malaysia and Thailand.

E. CPSC Codes: 04.04.02.

2. DEFINE ROOT CAUSE

The root cause of the tire failures that were examined was tread separation from the tire carcass caused by a combination of the following contributing factors, some of which are unique to this areas environmental conditions.

A. Fatigue failure accelerated by high temperatures

Long exposure to elevated temperatures reduce the tear strength of the rubber between the top and bottom steel belts of the tire. This in conjunction with dynamic cycling (driving at high speeds) (which imparts additional heat into the rubber) and cornering causes more of this tearing between the 2 steel belt layers. This weakening/tearing of the rubber between the steel belt and the rubber is where the tire tread separation starts and "unzips" the tread.

- Some of these vehicles sat in dealer lots for 6 months to as long as 19 months in this high ambient environment. Add to this high ambient temperature the parking lot temperatures after being exposed to sun loads for many hours.

B. Low rolling resistance tires

It is not recommended, by any of our tire suppliers, to send our NAO designed low rolling resistance tires into these export markets that have extremely high ambient conditions, high driving speeds for extended periods, extremely poor road conditions, and overloading of vehicles with excess weight.

C. Extended / Repeated use at overloaded conditions in high ambient temperatures

SUV's in Asia Markets are repeatedly overloaded, as if they were pick-up trucks. This condition generates more heat in the tire, in addition to the high ambient operating conditions and possible high vehicle speeds.

D. Low inflation operating situation - causing internal tire damage resulting in tread separation caused by the following issues.

Unintentional under-inflation condition (puncture, other leak). Customer gets slow leak from puncture and drives on under-inflated tire and/or valve stem leakage due to customer not replacing cap. Low inflation exacerbates the potential for overheating.

E. Extended / Repeated use at extremely high speed in high ambient temperatures

Tires are speed rated per SAE procedure J1561 to run at rated speed (ie, 112 mph). Running the tires at high speeds have an accumulative effect on the tire separating at the interface between the 2 steel belt plies internally. The customers in Thailand and Malaysia can drive from Kuala Lumpur to Singapore for 3 hours at 106 mph.

F. Fatigue failure accelerated by ozone exposure

The high ozone levels caused by smoke (burning of forests) chemically attacks the rubber and breaks down the bonds linking the rubber molecules. We see this condition on the outer upper sidewall and shoulder area of the tires as cracks. These cracks can cause tread separation or sidewall bulges.

F. Please check the applicable item(s) in each category:

- Type: X Design ☐ Manufacturing ☐ Vehicle Assembly
  X Other (Specify - Customer - air pressure or Road Hazard -Puncture)
- System: ☐ Body X Chassis ☐ Cooling ☐ Fuel ☐ Electrical ☐ Engine
  ☐ Glass ☐ Restraints ☐ Transmission/Axle
  ☐ Vehicle Label/Publications ☐ Emissions Control
  ☐ OBD ☐ Other
- Symptom: ☐ Brake Control ☐ Emission Compliance
  ☐ Other Regulatory Compliance ☐ Driveability/No Start
  ☐ Engine Speed Control/Unexpected Movement ☐ Fire
  X Steering Control ☐ Occupant Restraint
  ☐ Visibility

3. PROBLEM INVESTIGATION/VERIFICATION DATA

A. Lab tests - None

B. Vehicle tests - None

C. Plant/supplier reports - Supplier (Bridgestone/Firestone) has been contacted in Japan and U.S. on Malaysia and Thailand incidents. Ford Explorer OPD Engineering has been contacted on Malaysia and Thailand incidences.

D. Quality Indicator System - Two (2) reported CQIS reports have been received on Malaysia incidents. Most incidences reported thru Region Specialist - Asia Pacific.

E. Field reports - 13 from Malaysia and Thailand
6 from Malaysia
7 from Thailand

F. Parts sales — Tires are not sold thru Ford dealers. Therefore no service parts count is available on problem tires.

G. Number of accidents/fines and injuries: 2 accidents in Malaysia and Thailand
0 fatalities, 0 major injuries, 0 minor injuries

4. ACTIONS TAKEN IN PRODUCTION; INTERIM (CONTAINMENT) AND/OR PERMANENT

A. Corrective actions – None.

B. Notification – None.

C. Provide WERS alert number - None.

D. Component batch issues – None.

5. VERIFY EFFECTIVENESS OF CORRECTIVE ACTIONS

A. A. None at this time.

6. ESTIMATED PRODUCTION AND PROBLEM STATISTICS (MAGNITUDE OF CONCERN)

A. Production Involved

VEHICLES AFFECTED (BY MODEL AND MODEL YEAR)	ASSEMBLY PLANTS* (INCLUDING KNOCK DOWN OPERATIONS)	VEHICLE PRODUCTION DATES		POTENTIALLY AFFECTED UNITS	
		FROM	UP TO AND INCLUDING	NUMBER OF UNITS	ESTIMATED PERCENTAGE OF VEHICLES THAT CONTAIN THE CONDITION
1997 Explorer	LAP	8/1/96	7/30/97	0	N/A %
1997 Explorer	SLAP	8/1/96	7/30/97	316	3 %

B. FCSD Region Specialist - Asia Pacific

7. AFTERMARKET PARTS

A. Released for Service: part is not released by Ford for service.

B. Tires are not stocked by depot or by Ford dealers. Firestone is aware of this tire concern and will determine whether they want to purge their inventory of tires at their distributor and tire stores in these export regions.

8. ASSESSMENT OF EFFECT ON VEHICLE OPERATION

In the event that a tire tread separates while the vehicle is traveling at extremely high rates of speed, the driver may have reduced or complete loss of steering control.

9. DESCRIPTION OF CONCERN SOLUTION AND PARTS REQUIREMENTS (FIELD SERVICE ACTIONS)

Short Term Actions:

A. Explorer OPD Chassis Engrg. has proven out one Goodyear tire made in Malaysia. Vehicle Development has completed their ride and handling evaluations of the Goodyear 235/75R15 109T A/T BSW Wrangler RT/S with Ford part number YL24-1508-EA and DOT code T8HL2A24. All other tire requirements are completed.

We will be re-flashing the engine controller to lower the top speed of the vehicle from 106 mph to 99 mph. This will put the vehicle top speed two T&RA speed steps (12mph) below the tires "T" speed capability.

On '97 vehicles we will be replacing the 5 Firestone tires with 5 Goodyear tires.

B. The Goodyear tire (made in Malaysia) was selected because it has a higher speed capability ("T" versus "S") and can therefore withstand more internal tire temperature before tread separation can occur.

-Also the tire is constructed more like a light truck (LT) tire than a P metric tire to take the severe punishments of these countries bad roads and overloading conditions. This tire does not have a low rolling resistance construction.

Long Term Actions:

A. No long term prime action has been assessed yet.

B. Test processes, plant complexity, market wants and other factors will be thoroughly considered in developing a long term action.

10. PROGRAM PARTS SIGN OFF/AVAILABILITY

Goodyear Wrangler RT/S tire 235/75R15 A/T BSW part number (YL24-1508-EA) and (DOT code T8HL2A24) is available and fully approved as an after market tire. This tire is built in Malaysia for the aftermarket. No tooling is needed for this part number.

Part availability schedule:

YL24-1508-EA DOT code T8HL2A24	Goodyear to build tires to meet demand of owner's notification

11. **SUPPLIER INVOLVEMENT** (if applicable)

A. The name of the causal part supplier:

Bridgestone / Firestone, Inc.
One Towne Square, Suite 1470
Southfield, MI 48076-3705
John Behr, Account Executive 248-208-3623

B. This condition is component-related, and is specifically related to the unique customer usage patterns and environmental conditions of the Persian Gulf Coast States.

C. Percentage of the root cause contributed by the supplied component - TBD

D. Do NOT deliver copy of this paper to tire buyer George Coundouriotis when completed and approved.

E. Manufacturing site code for the responsible supplier location - F593A.

F. Judith Sullivan JSULLIV4 x-47679 (Manager) / George Coundouriotis GCOUNDOU x-46803 (Buyer). Ford STA field engineer for Firestone is Lewis Garcia LGARCIA3 at 313-248-6211.

G. At the time of Advice of Field Service Action is approved, the engineer must forward the revised Field Service Action Evaluation paper to the FAO Controllers Office (QMP, MD626, PO. 1587A, Room 486) in North America, or to GB-15/4B-E15 in Europe.

12. FINANCIAL IMPLICATIONS

A. Note: If assistance is needed, contact the Ford Customer Service Division, Recalls & Service Programs (For Europe: Room GB-1/329, Telephone: 8734-2049, for North America, DSC II, Room 785, 24-88817).

		Vehicle Volume	Cost Per Unit	Total Cost (000)
A	Program Administration Costs	316		
B	Inspection Costs (Units to be Inspected but Not Modified) . Labor			
C	Modification Costs(Units to be Inspected and Modified) • Parts • Labor			
D	NGS Cards and Flash Cables		REDACTED	
E	Dealer Administration Allowance (for safety and emissions recalls only)			
F	Total Cost (total A through E)			
G	Percentage of Recommended Supplier Recovery (if applicable or TBD if unknown)			
H	Supplier Impact (E * F, if applicable)			
I	Net FORD Exposure (E-G)			
J	Potential Warranty Offset			

Purchasing, Engineering, and other appropriate activities will jointly determine the extent of supplier financial responsibility. If supplier reimbursement is warranted in the field service action, purchasing will negotiate cost recovery.

13. PREVENT ACTIONS

A. Low inflation operating situation -

- Low pressure warning device (part of IVD) is being recommended for future SUV's (U152, U231, U222) going to this region to warn customer's of under-inflated tires.

Extended/repeated use at extremely high speed -

- Tire SDS, ES spec and WDMO/EEME Regulations to be modified to include the following for SUV's going to Malaysia and Thailand markets:

  -Use tire with speed rating at least one (1) level higher than the vehicle max speed when adjusted for vehicle recommended tire pressure. If this tire construction does not exist, then speed limit the vehicle to one speed level (6mph) below the tires speed capability when adjusted for vehicle recommended tire pressure.

  OR

  - Tire should have a minimum of a "A" temperature rating by the UTQG system.

  AND

  -Tire should be of a "special service" construction for extreme puncture resistance.

Fatigue failure accelerated by high temperature and ozone-

- RVT to establish a test procedure to determine minimum tire requirement for this market. Test will be added to tire SDS and ES Spec. Test availability is scheduled for March 1, 2000 completion.
- Tire design failure mode and affects analysis (DFMEA) needs to be updated with this new failure mode and test requirement above once established.
- New programs (including U152) will meet new SDS requirement for spare tire cannot exceed 63C (145F). U152 is shielding exhaust pipe and tire with a heat shield.

B. Identify how "generic" items or processes could be impacted similarly and how such impact will be prevented.

C. State what "Corporate Memory" Documents (e.g., Engineering Design Standards, World Class Requirements, FMEA, etc.) have been or will be updated to provide guidance for future campaign prevention. Include the scheduled or actual timing for the above actions.

14. REFERENCE DATA

A. Presenter - Allan Rauner, ARAUNER, 59-42821, Explorer Chassis OPD.

B. Each page of the evaluation paper should indicate "Draft of (Date)." Draft papers should not be stamped with a "Record Copy" retention stamp.

C. When programs are recommended for implementation by the Field Review Committee, the reporting organization is to incorporate any changes in the draft paper recommended by the FRC and within two weeks, submit the final paper to the Secretary of the FRC for filing (For North America , Diagnostic Service Center II, Suite 785, for Europe, Room G-1/329, Recall and Service Programs, FCSD-E).

1997 Explorer P235/75R15 Tire Separation in Malaysia and Thailand

Draft of 1/27/2000

1. **PROBLEM DESCRIPTION** (what/when/extent)

A. While driving vehicle, the tire tread separated (belt edge separation) from the main carcass of the tire. The tire failure is discovered when the driver hears the tire tread hitting the wheel house or the tire goes flat.

Incidences caused by tire tread separation:

13 incidences caused by tire tread separation have been reported in Malaysia (6) and Thailand (7) combined.

- These failures have been on '97 vehicles, all at mileages between 16,500 km and 55,500 km (10,250 - 34,500 miles).
- 2 of the 13 incidences were caused by punctures or severe tread cut around complete tire.
- There have been no reported accidents or rollovers associated with these 13 incidences of tread separation.

B. Firestone P235/75R15 A/T ROWL tire, part # F77A-1508-MA, construction code ST381J. date codes on tires built between 12/25/96 and 2/7/97for Malaysia vehicles and between 1/21/97 and 4/7/97 for Thailand vehicles. This tire size and construction is a regular production option on U.S. models and is the standard size tire on exported Explorer~~/Mountaineer~~ going to ~~Japan, Korea,~~ Malaysia and Thailand.

C. Vehicles Affected:

Model Year (s)	Vehicle Lines	Vehicle Volume	Variants	Other Limiting Factors
Malaysia 1997	Explorer	109	4X4, 4 dr, 4.0L, Auto	P235/75R15 A/T ROWL tire
Thailand 1997	Explorer	277	4X4, 4 dr, 4.0L, Auto	P235/75R15 A/T ROWL tire
~~2000~~	~~Explorer~~	~~6~~	~~4X4, 4dr, 4.0L, Auto~~	~~P255/70R16 A/T ROWL tire~~
		392		

D. Markets Affected: Malaysia and Thailand.

E. CPSC Codes: 04.04.02.

2. DEFINE ROOT CAUSE

The root cause of the tire failures that were examined was tread separation from the tire carcass caused by a combination of the following contributing factors, some of which are unique to this areas environmental conditions.

A. Low inflation operating situation - causing internal tire damage resulting in tread separation caused by the following issues.

Unintentional under-inflation condition (puncture, other leak). Customer gets slow leak from puncture and drives on under-inflated tire and/or valve stem leakage due to customer not replacing cap.

B. Extended / Repeated use at extremely high speed in high ambient temperatures

Tires are speed rated per SAE procedure J1561 to run at rated speed (ie, 112 mph) for only a limited period of time (10 minute steps at 38 psi) before the tire starts to separate at the interface between the 2 steel belt plies internally. Running the tires at high speeds have an accumulative effect on the tire separating at the interface between the 2 steel belt plies internally. The customers in Thailand and Malaysia can drive from Kuala Lumpur to Singapore for 3 hours at 106 mph.

C. Extended / Repeated use at overloaded conditions in high ambient temperatures

Goodyear's chief engineer for Asia Markets stated that SUV's in these markets are repeatedly overloaded, as if they were pick-up trucks. This condition generates more heat in the tire, in addition to the high ambient operating conditions and possible high vehicle speeds.

D. Fatigue failure accelerated by high temperatures

Long exposure to elevated temperatures reduce the tear strength of the rubber between the top and bottom steel belts of the tire. This in conjunction with dynamic cycling (driving at high speeds) (which imparts additional heat into the rubber) and cornering causes more of this tearing between the 2 steel belt layers. This weakening/tearing of the rubber between the steel belt and the rubber is where the tire tread separation starts and "unzips" the tread.

- One of the failures was a spare tire that was but on the vehicle after sitting in the spare tire well for 50,000km. This spare tire can see temperatures in excess of the SDS approved temperature of 63C (145F)

- Some of these vehicles sat in dealer lots for 6 months to as long as 19 months in this high ambient environment. Add to this high ambient temperature the parking lot temperatures after being exposed to sun loads for many hours.

E. Fatigue failure accelerated by ozone exposure

The high ozone levels caused by smoke (burning of forests) chemically attacks the rubber and breaks down the bonds linking the rubber molecules. We see this condition on the outer upper sidewall and shoulder area of the tires as cracks. These cracks can cause tread separation or sidewall bulges.

F. Please check the applicable item(s) in each category:

- Type: X Design ☐ Manufacturing ☐ Vehicle Assembly
  X Other (Specify - Customer - air pressure or Road Hazard -Puncture)
- System: ☐ Body X Chassis ☐ Cooling ☐ Fuel ☐ Electrical ☐ Engine
  ☐ Glass ☐ Restraints ☐ Transmission/Axle
  ☐ Vehicle Label/Publications ☐ Emissions Control
  ☐ OBD ☐ Other
- Symptom: ☐ Brake Control ☐ Emission Compliance
  ☐ Other Regulatory Compliance ☐ Driveability/No Start
  ☐ Engine Speed Control/Unexpected Movement ☐ Fire
  X Steering Control ☐ Occupant Restraint
  ☐ Visibility

3. PROBLEM INVESTIGATION/VERIFICATION DATA

A. Lab tests - None

B. Vehicle tests - None

C. Plant/supplier reports - Supplier (Bridgestone/Firestone) has been contacted in Japan and U.S. on Malaysia and Thailand incidents. Ford Explorer OPD Engineering has been contacted on Malaysia and Thailand incidences.

D. Quality Indicator System - Two (2) reported CQIS reports have been received on Malaysia incidents. Most incidences reported thru Region Specialist - Asia Pacific.

E. Field reports - 13 from Malaysia and Thailand
6 from Malaysia
7 from Thailand

F. Parts sales — Tires are not sold thru Ford dealers. Therefore no service parts count is available on problem tires.

G. Number of accidents/fines and injuries: 0 accidents in Malaysia and Thailand
0 fatalities, 0 major injuries, 0 minor injuries

4. ACTIONS TAKEN IN PRODUCTION; INTERIM (CONTAINMENT) AND/OR PERMANENT

A. Corrective actions – None. There have been six (6) 2000 MY Explorer's shipped to Thailand. Because we have no capacity in the plant to add an additional tire for export, we would recommend that no additional 2000 MY Explorers get built or shipped to Malaysia or Thailand.

B. Notification – None.

C. Provide WERS alert number - None.

D. Component batch issues – None.

5. VERIFY EFFECTIVENESS OF CORRECTIVE ACTIONS

A. A. None at this time.

6. ESTIMATED PRODUCTION AND PROBLEM STATISTICS (MAGNITUDE OF CONCERN)

A. Production Involved

VEHICLES AFFECTED (BY MODEL AND MODEL YEAR)	ASSEMBLY PLANTS* (INCLUDING KNOCK DOWN OPERATIONS)	VEHICLE PRODUCTION DATES		POTENTIALLY AFFECTED UNITS	
		FROM	UP TO AND INCLUDING	NUMBER OF UNITS	ESTIMATED PERCENTAGE OF VEHICLES THAT CONTAIN THE CONDITION
1997 Explorer	LAP	8/1/96	7/30/97	0	N/A %
1997 Explorer	SLAP	8/1/96	7/30/97	386	0 %
2000 Explorer	SLAP	8/1/99	7/30/00	6	0 %

B. [redacted] - Region Specialist - Asia Pacific

7. AFTERMARKET PARTS

A. Released for Service: part is released for service but Ford does not stock any tires for service.

B. Tires are not stocked by depot or by Ford dealers. Firestone must determine whether they want to purge their inventory of tires at their distributor and tire stores in these export regions.

8. ASSESSMENT OF EFFECT ON VEHICLE OPERATION

In the event that a tire tread separates while the vehicle is traveling at extremely high rates of speed, the driver will likely have reduced or complete loss of steering control. At these rates of speed a loss of control will likely cause a collision or tripping of the vehicle when it leaves the roadway resulting in a rollover.

9. DESCRIPTION OF CONCERN SOLUTION AND PARTS REQUIREMENTS (FIELD SERVICE ACTIONS)

Short Term Actions:

A. Explorer OPD Chassis Engrg. has proven out one Goodyear tire made in Malaysia. Vehicle Development has completed their ride and handling evaluations of the Goodyear 235/75R15 109T A/T BSW Wrangler RT/S with DOT code T8HL2A24. All other tire requirements are completed.

We will be re-flashing the engine controller to lower the top speed of the vehicle from 106 mph to 99 mph. This will put the vehicle top speed ~~one~~ to T&RA speed step (12mph) below the tires "T" speed capability.

On '97 vehicles we will be replacing the 5 Firestone tires with 5 Goodyear tires.

On the six (6) 2000 MY Explorers, these vehicles have the 16" P255/70R16 tire from Firestone. We have not decided whether to replace the 16" tires on these vehicles or not.

add these 6 vehicles to GCC Tire Program, Diana has 6 VIN's,

Long Term Actions:

A. No long term prime action has been assessed yet.

B. Test processes, plant complexity, market wants and other factors will be thoroughly considered in developing a long term action.

10. PROGRAM PARTS SIGN OFF/AVAILABILITY

Goodyear Wrangler RT/S tire 235/75R15 A/T BSW part number (no Ford part number) and (DOT code T8HL2A24) is available and fully approved as an after market tire. Because this tire is built in Malaysia for the aftermarket, this tire does not have a Ford PPAP approval but does have FMVSS and DOT approval. No tooling is needed for this part number.

Part availability schedule:

No Ford part number DOT code T8HL2A24	Goodyear to build tires to meet demand of owner's notification

11. SUPPLIER INVOLVEMENT (if applicable)

A. The name of the causal part supplier:

Bridgestone / Firestone, Inc.
One Towne Square, Suite 1470
Southfield, MI 48076-3705
John Behr, Account Executive 248-208-3623

B. This condition is component-related, and is specifically related to the unique customer usage patterns and environmental conditions of the Persian Gulf Coast States.

C. Percentage of the root cause contributed by the supplied component - TBD

D. Do NOT deliver copy of this paper to tire buyer George Coundouriotis when completed and approved.

E. Manufacturing site code for the responsible supplier location - F593A.

F. Judith Sullivan JSULLIV4 x-47679 (Manager) / George Coundouriotis GCOUNDOU x-46803 (Buyer). Ford STA field engineer for Firestone is Lewis Garcia LGARCIA3 at 313-248-6211.

G. At the time of Advice of Field Service Action is approved, the engineer must forward the revised Field Service Action Evaluation paper to the FAO Controllers Office (QMP, MD626, PO. 1587A, Room 486) in North America, or to GB-15/4B-E15 in Europe.

12. FINANCIAL IMPLICATIONS

A. **Note:** If assistance is needed, contact the **Ford Customer Service Division. Recalls & Service Programs (For Europe: Room GB-1/329, Telephone: 8734-2049, for North America. DSC II. Room 785. 24-88817).**

		Vehicle Volume	Cost Per Unit	Total Cost (000)
A	Program Administration Costs	386	$0.65	$0.251
B	Inspection Costs (Units to be Inspected but Not Modified) . Labor (0.2 hours x $60.17)	0	$12.03	$0
C	Modification Costs(Units to be Inspected and Modified)			
	• Parts (priced at dealer price $84	386	$560.00	$216.160
	plus __40___%) = $112x5=$560	386@0.4x60.17	$24.07	$9.290
	• Labor (1.5 hours x $60.17)	386@1.5x60.17	$90.26	$34.838
D	NGS Cards and Flash Cables			$7.500
E	Dealer Administration Allowance (for safety and emissions recalls only) [0.1 hours x $ $60.17 labor rate – N.A.]	0	$6.02	$0
F	Total Cost (total A through E)	386	$694.40	$268.039
G	Percentage of Recommended Supplier Recovery (if applicable or TBD if unknown)			% __TBD___
H	Supplier Impact (E * F, if applicable)			TBD
I	Net FORD Exposure (E-G)			**$268.039**
J	Potential Warranty Offset	386	$0.00	$0

Purchasing, Engineering, and other appropriate activities will jointly determine the extent of supplier financial responsibility. If supplier reimbursement is warranted in the field service action, purchasing will negotiate cost recovery.

13. PREVENT ACTIONS

A. Low inflation operating situation -

- Low pressure warning device (part of IVD) is being recommended for future SUV's (U152, U231, U222) going to this region to warn customer's of under-inflated tires.

Extended/repeated use at extremely high speed -

- Tire SDS, ES spec and WDMO/EEME Regulations to be modified to include the following for SUV's going to Malaysia and Thailand markets:

  -Use tire with speed rating at least one (1) level higher than the vehicle max speed when adjusted for vehicle recommended tire pressure. If this tire construction does not exist, then speed limit the vehicle to one speed level (6mph) below the tires speed capability when adjusted for vehicle recommended tire pressure.

  OR

  - Tire should have a minimum of a "A" temperature rating by the UTQG system.

  AND

  -Tire should be of a "special service" construction for extreme puncture resistance.

Fatigue failure accelerated by high temperature and ozone-

- RVT to establish a test procedure to determine minimum tire requirement for this market. Test will be added to tire SDS and ES Spec. Test availability is scheduled for March 1, 2000 completion.
- Tire design failure mode and affects analysis (DFMEA) needs to be updated with this new failure mode and test requirement above once established.
- New programs (including U152) will meet new SDS requirement for spare tire cannot exceed 63C (145F). U152 is shielding exhaust pipe and tire with a heat shield.

B. Identify how "generic" items or processes could be impacted similarly and how such impact will be prevented.

C. State what "Corporate Memory" Documents (e.g., Engineering Design Standards, World Class Requirements, FMEA, etc.) have been or will be updated to provide guidance for future campaign prevention. Include the scheduled or actual timing for the above actions.

14. REFERENCE DATA

A. Presenter - Allan Rauner, ARAUNER, 59-42821, Explorer Chassis OPD.

B. Each page of the evaluation paper should indicate "Draft of (Date)." Draft papers should not be stamped with a "Record Copy" retention stamp.

C. When programs are recommended for implementation by the Field Review Committee, the reporting organization is to incorporate any changes in the draft paper recommended by the FRC and within two weeks, submit the final paper to the Secretary of the FRC for filing (For North America, Diagnostic Service Center II, Suite 785, for Europe, Room G-1/329, Recall and Service Programs, FCSD-E).

CRITICAL CONCERNS REVIEW GROUP (NORTH AMERICA)

- Page 2 -

File:	**5K01**	**Opened:**	**August 26, 1999**	**Closed:**	**February 3, 2000**
VLD→ (Lead)	**TVC** **Dale Claudepierre**	**Assisting Activities:** **OPD-Chassis**		***CAMPAIGN:***	**00B35**
				Contacts:	Jeannette Madej – 96531 Allen Reamer – 42841 Diana Chan – 77630 Greg Oswalt – 81160

MODELS:	**1995-99 EXPLORER (Venezuela) (Malaysia/Thailand added)**
Input Source:	**FCSD / ASIA PACIFIC**
Concern Description:	**15 inch tires tread separation**

Mtg #/Date: **CONCERN INVESTIGATION DATA**

1760/Dec 9 OPD: Chart attached.

- All tires inspected so far found no apparent reason for failure. No external or visual cause such as nail, cut, etc.
- Firestone survey indicates major cause is under inflation—54% were below recommended pressure. Common practice to under inflate for off-road driving. Note: U.S. tends to over inflate tires. Does not appear to be reversion, i.e., overheating of rubber. Conclusion is driving under inflated tires at high speed and in high temperatures.
- Examined many of GCC and Malaysia/Thailand tires. Separation begins at top belt, progresses into skin over wires, delaminates top tread. Could see different levels on Thai tires inspected.
- Testing the currently released in Malaysia Goodyear tire to Ford requirements. Waiting to receive Malaysia tires. Need testing before can release this tire and make recommendations.
- 14D has been drafted.

1765/Jan 6 Tech Review held.

1773/Feb 3 The FRC approved a field action for the subject markets. Number TBD

Closed.

1995 / 99 Explorer/Mountaineer P255/70R16 Tire Separation in GCC Countries

PROBLEM DESCRIPTION

WDMO reported from GCC countries that while driving vehicle, the tire tread separated (belt edge separation) from the main carcass of the tire. The tire failure is discovered when the driver hears the tire tread hitting the wheel house or the tire goes flat.

ROOT CAUSE

The investigation identified a combination of the following five (5) root causes for tread separation:
1) Low inflation operating situation - causing internal tire damage resulting in tread separation
2) Extended / repeated use at extremely high speed in high ambient temperatures
3) Extended / repeated use at overloaded conditions in high ambient temperatures
4) Fatigue failure accelerated by high ambient temperatures
5) Fatigue failure accelerated by ozone exposure (in areas near oil fields)

PROBLEM INVESTIGATION

WDMO reported that 19 incidences of tread separation have occurred in the GCC region. These failures have been on '96 and '97 vehicles, all at mileage's between 9,500 - 34,000 miles. The tire in question is the Firestone P255/70R16 A/T ROWL tire, part # F57A-1508-JA, construction code ST369J.

It has been noted that vehicles in this region drive at extremely high speed (100-106mph) for extended periods of time, many times a year. It has also been noted that ambient temperature in this region of the world exceed 135F with unofficial temperatures as high as 150F. With ambient temperature this high, the road surface that the tire sees can reach in excess of 200F. These high temperatures can degrade the tire structure.

Conducted special high speed tire tests at reduced pressures (20psi) on several different tire constructions to see if any competitive tires held up better at extended high speed at reduced pressure. It was found that the tires tended to follow the tire speed rating on the tire. This Firestone tire has only a 2mph speed cushion between the speed capability of the tire and the speed capability of the vehicle, less than any other Ford vehicle exported to this region.

ACTIONS TAKEN

Conducted a owner notification in the GCC region for 6755 '95 thru '99 Explorer and Mountaineer vehicles to replace the tires with a Goodyear tire that was used on F150 and Expedition vehicles sold in the region in '96 and '97 with no reported incidences of tread seperation. Also, the maximum speed of the vehicles are being reduced from 106mph to 99mph (via a new E-PROM) to give the tires a larger speed cushion between the tire and vehicle maximum speed capability.

The 2000 Explorer's will not be exported into GCC because of late introduction of the model into the market because of tire availability and the early cancellation of the UN150 vehicle so that there are no vehicles on hand when the U152 model arrives.

Explorer Chassis OPD department is going into the southwest and request 500 tires be returned to Firestone for a statistical analysis of tire failures in this area of the country that is similar to the temperatures experienced in GCC region. This analysis will take several months to get tires off of vehicles that are returning from leases and turn-ins, and analyze them at Firestone in Akron.

Firestone is developing a test procedure that duplicates the failure mode in GCC region, so that we can test future tire designs to prove they won't have this same problem. Timing for this test procedure is 3-1-00.

Firestone is working on a new "rest of world tire" for U152 which will be more puncture resistant and have excess speed capability than the truck requires to give the vehicle a greater speed cushion for GCC.

RECOMMENDATION

Explorer Chassis OPD Engineering recommends closure of this concern based on the following:
. OPD engineering has taken short term and long term corrective action.
. WDMO / OPD engineering has performed a owners notification in the region that has the problem.
. Root cause identified and permanent corrective actions are in place.
. OPD engineering has implemented a plan to visit the southwest to determine if the problem exists in the U.S.

9-7-99
Allan Rauner
Explorer Chassis OPD Engineering

Jeanette Madej
Explorer Chassis OPD Supervisor

Memorandum

To: Ms Carole Wilson, Mr Mike Pease, Mr Derek Clatworthy

From: Kitipong Kitipongpatana

Date: 24 March 2000

CC:
Mr Chalermporn Benjatikul
Ms Siriphan Tantinirundri
Marketing Department
Wunderman Cato Johnson
Mr Wichit Wongwatthanakan
Ms Niramon Sirikiatikul
Vehicle Sales Department
Parts Distribution Department

Subject: Explorer Tyre Recall Campaign Approval Document

Concern: Explorer Tyre Replacement **Ref No: 00B35**

A service recall campaign is a means of inspecting and rectifying Ford product issues for customers, dealer stock vehicles and Company stock vehicles. Identifying and remedying Campaign issues is important as they protect customer safety and enhance satisfaction.

Field reports indicate that vehicles equipped with P235/75R15 Firestone "All Terrain" brand tyres may experience interior tyre degradation and tread separation, this condition is due the unique regional usage patterns and environmental conditions, potentially resulting in a loss of vehicle control.

Affected Vehicles

Campaign Classification	Model	Campaign Issue	No. of Vehicles	Affected Build Period	
				From	To
Safety Recall Campaign	Ford Explorer	Firestone "All Terrain" Brand Tyres	206	1 Aug 1996	30 Jul 1997
Safety Recall Campaign	Ford Explorer	Firestone "All Terrain" Brand Tyres	6	2000 MY	

1.0 Campaign Concepts

1.1.1 Tyes will be delivered to the Ford Dealers. Ford Operations (Thailand) Co Ltd will accept responsibility for the following:
- Supplying Goodyear with initial allocation information
- Supplying Goodyear with Dealer additional stock requests
- Inventory control

Note: ***A suitable lead time is required for delivery to Up-Country Dealers and two day lead time is required for delivery to Bangkok Dealers***

1.1.2 Three types of replacements schemes:
- By Ford Dealer
- By B Quik
- By professional sublet fitter

1.1.3 Replacement assessment:
- Warranty claim evidence, as per the Warranty & Policy Manual
- The tyre plant identification code should be cut from the tyre and sent with the warranty claim

1.1.4 Campaign commencement date and completion date:
- Commencement date: ***(26 April 2000)***
- Completion date: ***(1 December 2000)***

Memorandum

Concern: Explorer Tyre Replacement **Ref No: 00B35**

1.2 Tyre Distribution:

1.2.1 Necessary parts per vehicle:

Explorer 1996 - 1997	**Explorer 2000, 16 inch rim**
Affected vehicles 206	**Affected vehicles 6**
Tyres X 5	Tyres X 5
Valves X 5	Valves X 5
	Rims X 5
	Centre Caps X 4
	Wheel Nuts X 20

Note: ***Ford Sales and Service has six new 2000MY import vehicles that require rims, centre caps and two of the vehicles requires new wheel nuts. The table above is indicative of the various requirements of the recall campaign***

1.2.2 Distribution Method

Initial allocation will be based on previous Explorer Campaign vehicle/car dealer mapping information

- Parts refilling when necessary
- Unused new tyres will be collected at the end of the campaign

1.2.3 Materials Costs:

Tyres & Valves:

- Supplied Ford Motor Company

Other Materials (Consumables):

- Wheel weight costs will be charged back to Ford Motor Company as miscellaneous items

1.2.4 Distribution Costs:

- Goodyear has included the distribution cost and valves in the sale price of the tyres. All distribution expenses will be transparent from a recall expense prospective

1.3 Replacement Operation

1.3.1 Replacement by Car Dealers

- Replacement cost (inclusive of administrative costs): Fully supported by FMC

Description	**Labour Operation**	**Hours**
Tyre Inspection	00B35A	0.2
Tyre Replacement	00B35B	1.5
Reflash PCM	00B35C	0.4
	Total	2.1

Region	**Labor Rate**	**Allocated Time**	**Total Cost**
Bangkok	270 THB/hr	2.1 hours	567 THB
Up Country	210 THB/hr	2.1 hours	441 THB

Memorandum

Concern: Explorer Tyre Replacement **Ref No: 00B35**

1.3 Replacement Operation Continued

1.3.2 Replacement by Professional Fitter

- The Dealer will contact the sublet fitter in order to organize replacement scheduling. Any trouble in scheduling will be reported to FOT
- The Dealer will inspect the vehicle and confirm the tyres requires replacement
- The Dealer will remove the wheels from the vehicle and deliver the wheels, with the new tyre to the fitter
- The PCM will be recalibrated at the dealership while the tyres are being replaced
- The sublet fitters will perform the repair work at their workshop premises

1.4 Miscellaneous

Some vehicles have already been replaced with upgraded tyres. This rework occurred prior to the campaign launch. Based on the information provided by Ford Operations (Thailand) Co Ltd. FMC agree to compensate Ford Sales & Service (Thailand) Co Ltd for all vehicles concerned.

2.0 Associated Costs

2.1 Labour

Region	Labour Rate	Number of Vehicles Repaired
Bangkok	270	80%
Up-Country	210	20%
Weighted Average	**258**	**100%**

- Tyre Inspection & Flashing **52 units @ 0.6 Hr @ 258 Baht = 9,597.60 Baht**
- Complete Tyre Replacement Operation **144 units @ 2.1 Hr @ 258 Baht = 78,019.20 Baht**

Total 9,597.60 Baht + 78,019.20 = 87,616.80 Baht

2.2 FSST Operating Costs

[redacted]

2.3 Upgrade Expense for New Vehicles (Six Vehicles)

Part Description	Part Number	Claim Price	Qty
• Tyre & valve	235/75R15 109T Wrangler RT/S	2,782	30
• Rim	F67Z1007NA	10,058	30
• Centre Cap	F57Z1130EB	1,048	24
• Wheel Nuts	F8TZ1012A	39	40
	Total	**411,912 Baht**	

Memorandum

Concern: Explorer Tyre Replacement **Ref No: 00B35**

2.4 Parts

Part Description	Part Number	Claim Price	Qty
• Tyre & valve	235/75R15 109T Wrangler RT/S	2,782	720
	Total	**2,003,040 Baht**	

Note: ***The tyres & tyre valves will be supplied & delivered free of charge by Goodyear. FMC will bear the associated costs***

3.0 Total Costs

• Labour	**87,616.80**	**Baht**
• FSST Operating Costs	**11,710**	**Baht**
• Upgrade Expense for new vehicles	**411,912**	**Baht**
• Parts (Tyre & valve)	**2,003,040**	**Baht**
Total Cost of the Recall:	**2,514,278.80**	**Baht**

Note: ***The figures provided above are indicative of 70% tyre replacement, but include 100% of vehicles being inspected and flashed.***

*****All unshaded costs will be charged to the source affiliate*****

4.0 Approval

This memorandum defines the campaign classification, the affected component and model, as well as providing an understanding on the magnitude of the concern. The attached documents provide associated actions and controls necessary to promote the efficient and expeditious handling of this campaign.

Please review the proposal and if you concur, sign the approval section below.

Recommended:

Chalermporn Benjatikul
Field Service Manager

Derek Clatworthy
Parts & Service Director

Approvals:

Mike Pease
Executive Director

Carole Wilson
Sales Controller

Danny,

Thank you for your comments. I am forwarding your note to the WDMO FCSD Customer Support Manager for further consideration.

-----Original Message-----
From: Danny Hinchin [mailto:dhinchin@hha.com.sa]
Sent: Sunday, May 14, 2000 06:37 PM
To: Piereson, Bradley (B.Q.) (E-mail)
Cc: Dave Mac Kinnon (E-mail); Ali H. Alireza; Yousuf Alireza; David Goatley
Subject: Legal Case

Brad,

A Mr. Amaan Sadat has instigated legal proceedings against Haji Husein Alireza, for losses as a result of accident to his Mountaineer. This was one of the early cases, is well documented, and had gone through the process of Ford inspection and eventual claim rejection.

His action of course was not unexpected, however, we are now in the position of being taken to court on an issue over which we should have no liability.

Ford Motor Company's handling of this issue has in my opinion inflamed the problem . We are at the position now where Ford are rejecting claims from owners, so the dealers themselves are left to face the customer.

Some comments:

Incidences of tyre failure are higher than other make of tyre, suggesting a tyre construction/mis-application concern. This is not restricted to GCC, and is also occurring in US Domestic. I have researched this, the NHTSA website has had comments from owners in this regard.

In all cases I can recall, the tyre that failed was the nearest to the exhaust, suggesting that the heat properties of the tyre were close to critical anyway. This reinforces the fact that the tyre for this market was specified incorrectly.

An ONP was issued to replace Firestone with Goodyear. If this doesn't indicate a tyre construction/mis-application concern I do not know what does.

The recall also has us reprogram the PCM to lower the top speed by 5 mph. Again, this incremental decrease suggests to me that tyre spec/speed rating is critical on this particular application. I remain unconvinced that this measure provides an adequate safety margin even with the Goodyears.

Ford's rejection of claims is of course based on several factors, but one of which that is freely admitted by Ford is the fact that accidents could not be replicated when the failures were simulated back in the US. The means of testing were clearly ridiculous. Strap a professional test driver into a vehicle, then have him drive down a straight and level road, to have a tyre shot out by a marksman with a rifle. That is how the test was described to me. This is not a valid test for the following:

1. The driver is a professional driver, used to driving vehicles beyond their limits and skilled enough to get them back under control again.

2. He is ready and waiting for a tyre to be blown out.
3. Explosive detonation does not mirror the 'tread peel' type of failure these tyres have.

This of course is not the first time that there have been tyre issues on Fords in this market. Taurus/Sable had General Tyres failing the same way in 93/94. I believe you will be shortly seeing Continental tyre failures on Navigator. So there is history on this concern.

This concern, apart from dragging Haji Husein Alireza into court, is going to prove extremely detrimental to the marketability of Mountaineer/Explorer. You know full well how it works here. Word gets around fast, and the reputation of a vehicle can soar or crash and burn. Look at Taurus/Sable. A fine car now, but dead in this market due to its previous reputation.

Ford needs to re-instil faith in the vehicle by at first owning up to its responsibilities. There is absolutely no getting around the fact that by issuing an ONP to change the tyres, *Ford admit that the original tyres as specified for this market were unsuitable.*

We are talking perhaps two/three vehicles in this country. These could have been settled very early on, as we did ourselves for a customer at the start of this issue last year. Instead of Ford being grateful for our action in settling quietly and avoiding the issue going legal, we were admonished for handling it the way we did. Whilst one can appreciate the 'Pandora's Box' scenario of settling a claim, just how big is the box?

I have taken extreme pains to try and distance Haji Husein Alireza from this issue, as I suspected early on that Ford would adopt the stance that is taking on this matter. You don't deal with a manufacturer for ten years in one market without having an idea of how they are going to handle certain problems, and I was not surprised when the announcement was made by Dave MacKinnon in the Parts and Service Conference earlier this year that Ford were going to deny claims from customers on this issue. You will recall the single voice of reaction, mine, stating that uld be the dealers who would be left holding the baby. Well here we are.

urge that this issue be taken once again to a very senior level within Ford Motor Company. There is a great deal at stake.

Danny

FIELD REVIEW COMMITTEE

001344

To:

Secretary, FRC
Suite 785
Diagnostic Service Center II
Ford Customer Service Division – North America

The attached Evaluation Paper is being forwarded for review by the Field Review Committee. Copies have been submitted for review to:

Office of the General Counsel: YES ☐ NO ☐

Vehicle Environmental Engineering: YES ☐ NO ☐

Automotive Safety Office: YES ☐ NO ☐

VC Purchasing Director: YES ☐ NO ☐

Subject: Firestone Wilderness AT tire / Venezuela/Colombia/Ecuador – loss of tire tread

Concur: ____________________
Vehicle Line Director

____
Date

Concur: ____________________
Vehicle Center Engineering Director

____
Date

Concur: ____________________
FCSD Vehicle & Service Programs Director

____
Date

Approve: ____________________
Vice Center Vice President

____
Date

Approve: ____________________
FSCD Vice President

____
Date

595

1. PROBLEM DESCRIPTION

A. While driving a vehicle, the tire tread may get separated (belt edge separation) from the main carcass of the tire. Some tires throw the tread but remain inflated. Customers report that they heard a sound similar to an "explosion". The tire failure is discovered when the driver hears the tire tread hitting the wheel housing under the fender. Some rollovers have been attributed to tire separation by the media. As of 05/16/00, 50 alleged accidents attributed to tire tread separation. Tires involved show high mileage (from 80.000 km to 160.000 Km). Vehicles involved have been '96, '97, '98 and '99 MY. FOV have reports of incidents involving both tires, locally manufactured and USA manufactured. Venezuela, Colombia and Ecuador have unique customer usage patterns and conditions as compared to other markets.

B. Firestone P255/70R16 Wilderness AT 109S Tire:
Engineering part #: F57A1508-JA (Black letters)
F85A1508N -1A (White letters)
P235/75 R15 Wilderness AT 109S Tire:
Engineering part #: 987K1508-BA (Black letters)
987k1508- AA (White letters)

Service part: P255/70R16 Wilderness AT Tire (Black letters)
P255/70R16 Wilderness AT Tire (White letters)
P235/75 R15 Wilderness AT Tire (Black letters)
P235/75 R15 Wilderness AT Tire (White letters

C. Vehicles Affected:

- **Part name: P255/70R16 Wilderness AT 109S: Explorer 4x4 and F-150**
  P235/75 R15 Wilderness AT 109S: Explorer 4x2

Model Year(s)	Vehicle Line	Vehicle volume	Variants	Other Limiting Factors
1996	Explorer	1,680	4x4, Manual, Automatic, 4.0L.	255/70 R16 AT
1997	Explorer	9,049	4x4, Manual, Automatic, 4.0L.	"
1998	Explorer	11,089	4x4, Manual, Automatic, 4.0L.	"
1999	Explorer	4,299	4x4, Manual, Automatic, 4.0L.	"
1996	Explorer	505	4x2 Manual, Automatic, 4.0L.	235/75 R15 AT
1997	Explorer	3,137	4x2 Manual, Automatic, 4.0L.	"
1998	Explorer	5,734	4x2 Manual, Automatic, 4.0L.	"
1999	Explorer	2,536	4x2 Manual, Automatic, 4.0L.	"
1998	F-150	3,893	4x4, 4x2, Manual, Automatic.	255/70 R16 AT
1999	F-150	1,491	4x4, 4x2, Manual, Automatic.	"

1998/99	Imported Explorer	488	4x4, 4x2, Manual, Automatic.	255/70 R16 AT

D. **Markets Affected:** Venezuela. Even though there are few reports to date, FOV will also include in the program Venezuelan F-150 vehicles, and Explorer and F-150 vehicles in the Colombia and Ecuador markets because reputation is being affected.

E. **CPSC:** 04.04.02

2. **DEFINE ROOT CAUSE**
The root cause of the tire failures was determined to be tread separation from the tire carcass caused by a combination of the following contributing factors which are unique to customers usage and conditions in Venezuela.

A. Low inflation operating situation - causing internal tire damage resulting in tread separation caused by the following issues.

Improper repair:

Tire repairs being done using unapproved rope type plugs. This type of repairs may leak air, potentially unbeknown to the customer.

Unintentional under-inflation condition (puncture, other leak). Customer gets slow leak from puncture and drives on under-inflated tire.

Valve stem leakage due to customer not replacing cap, resulting in the allowance of external objects getting into the valve.

Continue/ Repeated use while under-inflated

Customers who do not realize that he/she is driving under inflated, may drive at extremely high speeds for prolonged periods of time.

B. Extended / Repeated use at high speed in high ambient temperatures

For the P235/75 R15 and P255/70 R16 (locally sourced) tires are non speed rated, per DOT 571-109 requires 30 min. at 160 KPH, and COVENIN 663-96 to run at a rated speed of 136 KPH for a period of time of 30 min., and 10 min. at 160 KPH before the tire starts to fail internally (under lab testing conditions and specific procedures).

For the P255/70 R16 (North American sourced) tires are "S" speed rated per SAE procedure J1561 to run at rated speed (i.e, 180 KPH) for only a short period of time (10 min steps at 38 psi) before the tire starts to fail internally (under lab testing conditions and specifics procedures). Customers in Venezuela are driving the Explorer and F-150 as fast as 160 KPH -100MPH- for hours, possibly several times a week, possibly every week of the year, for 3-4 years. Running the tires for long periods at high speeds have an accumulative effect on destroying the tire.

C. Extended / Repeated use at overload conditions in high ambient temperatures

We have found customer using the Explorer with eight people (adults and children) inside the truck with additionally luggages and camping equipment. This generate more heat in addition to the high ambient operating conditions and high vehicle speeds. These all ad up to speeding up the destruction to the tire internally.

Also the tread separation has a tendency to occur on the rear tire, with an estimated factor of 64% of the accidents.

D. Fatigue failure accelerated by high temperatures

The tire rubber internal bonds start to break down when exposed to high temperatures for extended periods of time. This in conjunction with dynamic cycling (driving at high speeds which imparts additional heat into the rubber) breaks more of these bonds between the rubber molecules and between the rubber and the steel belts. This weakening/breaking of the bonds between the steel belt and the rubber is where the tire tread separation starts and "unzips" the tread. In the operating conditions of the Venezuelan market the carcass of the tire in some cases may not be robust enough to last until the tire tread would indicate the need for tire replacement.

E. Please check the applicable item(s) in each category:

- Type: ✓☐ Design ☐ Manufacturing ☐ Vehicle Assembly
  ☐ Other (If other, specify _____)
- System: ☐ Body ☐ Chassis ☐ Cooling ☐ Fuel ☐ Electrical
  ☐ Engine ☐ Glass ☐ Restraints ☐ Transmission/Axle
  ☐ Vehicle Label/Publications ☐ Emissions Control
  ☐OBD ☐✓ Other (Tires)
- Symptom: ☐ Brake Control ☐ Emission Compliance
  ☐ Other Regulatory Compliance ✓☐ Driveability / Not Start
  ☐ Engine Speed Control/Unexpected Movement ☐ Fire
  ✓ ☐ Steering Control ☐ Occupant Restraint ☐✓ Personal Injury
  ☐ Visibility ☐ Warranty Avoidance / Customer Satisfaction
  ☐ Other (If other, specify _______)

3. PROBLEM INVESTIGATION/VERIFICATION DATA

A. Lab tests:

Firestone experts indicated that more samples to be tested at their laboratories were not required.

B. Vehicle tests:

In our (FOV, Firestone) field evaluation a total of 37 Explorer were examined without locating a sample that could reproduce the exact failure. There were damages done to the tires such as: superficial or on the steel belt punctures, under inflated tires, bad repairs, damage on the side walls etc, but not tread separation.

C. Plant / Supplier reports:

Supplier (Bridgestone / Firestone of Venezuela) has been contacted in Venezuela and U.S. about Venezuelan incidents. A team was formed in order to perform a field survey, this team involved Firestone Venezuela/ USA and Ford representatives. The conclusions from Firestone USA are:

- It was not detected any defect with the tire.
- Low inflation operating conditions caused by any of the following can cause damage to the tire when it continues to be run with inadequate pressure:

- Punctures, cuts which cause slow leaks and tire continues to be used with low inflation
- Poor tire maintenance
- Improper repairs.

They inspect 56 P255/70 R16 Wilderness AT and 76 P235/75 R15 Wilderness ATX tires.

D. Quality Indicators System: None.

E. Field reports: an approximate of 50 from Venezuela. All the reported cases have occurred in Venezuela.

F. Parts sales. Service changes are handled through Firestone dealers through Job'1 to March/2000. They are presently handled through Goodyear & Ford dealers.

G. Number of accidents/fines and injuries: There have been an estimated of fifty accidents. The Venezuelan media has attributed a number of fatalities and injuries to tire tread separation. We have not confirmed the cause of any of these accidents.

4. ACTIONS TAKEN IN PRODUCTION; INTERIM (CONTAINMENT) AND/OR PERMANENT

Interim corrective actions:

A modified Firestone tire Venezuelan made with a higher speed rating (S), cap-ply reinforcement and polyester materials for construction was developed. The use of the new tire in production was on the 06/15/99 (DOT-259). Additionally, the tire

inflation pressure was recommended to be of 30-32 psi as of 5/01/99 (previously set to 26 front – 28 rear psi for FOV vehicles only).

FOV Engineering Department released on September/99 for the 2000 MY Explorers and F-150 a Goodyear Wrangler RTS tire in order to improve our image and customer satisfaction. All the technical requirements and tests were completed successfully.

A. Notification: **Release number:** 98-229-2, 98-228-2, 98-050-6, 96-023-9 of 06/01/99 for the Wilderness Firestone tire.
99-209, 98-122-5, 99-208, 99-001-4 for the Goodyear Wrangler RTS tire on 08/25/99.

B. **WERS alert number:** None.
C. **Component batch issues:** None

5. VERIFY EFFECTIVENESS OF CORRECTIVE ACTIONS

A. The interim corrective tires were bench tested by Firestone at 160 KPH (100 MPH) for a period of four continuos hours without failure.

6. ESTIMATED PRODUCTION AND PROBLEM STATISTICS (MAGNITUDE OF CONCERN) Venezuela/Colombia & Ecuador

VEHICLES AFFECTED	ASSEMBLY PLANTS	VEHICLE PRODUCTION DATES	POTENTIALLY NUMBER OF UNITS	AFFECTED UNITS ESTIMATED PERCENTAGE OF VEHICLES THAT CONTAIN THE CONDITION
Explorer	FOV	Job1 96MY through 99MY	38.029	unknown
F-150	FOV	98 MY through some 99MY	5.384	unknown
BU/ Imported	USA	98 MY through some 99MY	488	unknown

7. AFTERMARKET PARTS

A. The Firestone tire was released on October 1995 until 06/15/99. Ford Motor de Venezuela, S.A. does not stock tires for service. Firestone dealers actual stock is unknown.
B Currently FOV Dealers are selling Goodyear tires.

Firestone must determine whether they want to purge their inventory of tires at their distributor and tire stores in Venezuela.

8. ASSESMENT OF EFFECT ON VEHICLE OPERATION

In the event that a tire tread separates while the vehicle is travelling at extremely high rates of speed, driver may have reduced or complete loss of steering control.

9. DESCRIPTION OF CONCERN SOLUTION AND PARTS REQUIREMENTS (FIELD SERVICE ACTIONS)

Short term actions:

The Engineering Department released a Goodyear tire in order to improve our image and customer satisfaction. All the technical requirements and tests are completed successfully.
Vehicles sold between job#1 '96 and '98 will be replacing the five (5) tires. Four of them a full size tire and the spare for another Goodyear but R15. On '98 and '99 MY vehicles we will be replacing all five (5) tires because the spare tire is the same size and construction as the four road tires. FOV will not be changing tires on any vehicle that comes in to our Dealers and has had the tires changed from Firestone to some other brand tire.

2000 MY Explorer produced in Venezuela and exported to Colombia and Ecuador are fitted with the Goodyear tires.

Long term actions:

A. No long term prime actions has been assessed yet.
B. Test processes, plant capacity, market wants and other factors will be thoroughly considered in developing a long term action.

10. PROGRAM PARTS SIGN OFF/AVAILABILITY

The Goodyear 255/70 R16 (black letters) part number 985K-1508-AA, 255/70 R16 (white letters) part number 995K-1508-BA, 235/75 R15 (white letter) part number F87A-1508-K3B and 235/75 R15 (black letters) part number 995K-1508-AA was released on 08/24/99. These tires were fully approved and PPAP released on the 10/22/99 and 11/11/99 respectively. No tooling is needed for this part number.
Part availability schedule: In production.

11. SUPPLIER INVOLVEMENT

A The name of the causal part supplier:

Bridgestone/Firestone Venezolana, C.A.
Carretera Nacional Valencia Los Guayos,
Valencia-Edo. Carabobo.
Venezuela.
Pedro Martinez, Sales Manager for Original parts 011-58-41-407777

B This condition is component-related, and is specifically related to the tire usage in the Venezuelan market.

C Percentage of the root cause contributed by the supplied component: TBD.

D. Deliver copy of this paper to tire buyer Martin Cadena when completed and approved.
E. Bridgestone / Firestone: LF177 , Prefit code: 6062
GOODYEAR: LG214, Prefit code: 6066
F. Miguel Ruiz MRUIZ2 (Manager) / Martin Cadena MCADENA (Buyer).

12. FINANCIAL IMPLICATIONS

Explorer	1996	1997	1998	1999	Total
	Units	Units	Units	Units	
Venezuela	1,094	7,394	10,531	5244	24,263
Colombia	1,091	3,780	5,158	1,206	11,235
Ecuador	0	1,012	1,134	385	2,531
Total	2,185	12,186	16,823	6,835	38,029

PN 96	1996	1997	1998	1999	Total
Venezuela			2,971	1,325	4,296
Colombia			815	70	885
Ecuador			106	96	202
Explorer Imp.			135	353	488
Total	2,185	12,186	20,850	8,679	43,900

Estimated Percentage Change 80%	35,120
Cost per Unit (Tires)	$ 302
Total Tires Cost $(Mils)	**$ 9,6**
Administrative, Marketing and Legal Cost (Mils)	**$ 1,5**
Old Tires Transportation and Scrap (Mils)	**TBD**

Purchasing, Engineering, and other appropriate activities will jointly determine the extent of supplier financial responsibility. If supplier reimbursement is warranted in the field service action, purchasing will negotiate cost recovery.

13. PREVENT ACTIONS

Low inflation operating situation:

.- Firestone and Hayes Wheels performed an instructive field trip all around Ford dealers in order to teach how to evaluate tires conditions, how to inspect a tire reparation, etc.

Extended / repeated use at extremely high speed:

.- Tire SDS, ES, spec and WDMO Regulations to be modified to include the following for all vehicles going to Andina markets:

- Use tire with speed rating at least one (1) level higher than the vehicle max speed when adjusted for vehicle recommended tire pressure. If this tire construction does not exist, then speed limit the vehicle to one speed level (10KPH) below the tires speed capability when adjusted for vehicle recommended tire pressure.
- Tire should have a minimum of a "A" temperature rating by the UTQG system.
- Tire should be of a "special service" construction for extreme puncture resistance.

Overall the tire carcass useful life should be designed to last the useful life of tread wear), as a measured at TWI (tread wear indicator), (i.e. tread should be fuse to indicate when the tire should be changed).

14. REFERENCE DATA

Edivia Caballero, ECABALL1, Service Engineer, 011-58-41-406189, Ford Motor of Venezuela.

Vehicle / Tire Speed Cushion for GCC Countries

1999 Vehicle	Tire Size	Tire Brand	Tire Temp Rating	Tire Speed Rating	Tire Pressure	Tire Speed Adjusted for Pressure	Vehicle Vmax (GCC)	Tire Safety Margin (mph)
2000 U204	P215/70R16	Mich/Good	B	T = 118	29 (200 kpa)	114	112 (180 kph)	2 @
Explorer	P255/70R16 109S	Firestone	B	S = 112	30/30	108	106	2
Explorer (In Venezuela)	P235/75R15	Firestone SA	B	R = 106	28/28	100	106	-6
	P255/70R16	Firestone SA	B	R = 106	28/28	100	106	-6
	P235/75R15 - New	Firestone SA	B	S = 112	30/30	108	106	2
	P255/70R16 - New	Firestone SA	B	S = 112	30/30	108	106	2
Ranger (from S. Amer)	LT215/75R15D	Firestone	NR	R = 106	35/35	106	94	12
	LT215/75R15D	Goodyear	NR	S = 112	35/35	112	94	16
	LT235/75R15C	Firestone	NR	R = 106	35/35	106	94	12
	LT235/75R15C	Goodyear	NR	S = 112	35/35	112	94	16
Econoline E350	LT245/75R16E	Goodyear	NR	S = 112	55/80	112	100	12
F150	P235/70R16 104S	Fire/Gen/BFG	B	S = 112	32/35	110	98	12F/14R
	P255/70R16 109S	Gen/Fire/Good	B	S = 112	29/32	108	98	10F/12R
#	P275/60R17 110T	Goodyear	B	T = 118	26-30	112	98	14F/16R
	P275/70R16 114H	Bridgestone	A	H = 130	26/32	124	98	26F/30R
F150 HD	P255/70R16 109S	Gen/Good	B	S = 112	35/35	112	98	14
	LT245/75R16D	Goodyear	NR	R = 106	45/60	106	98	8
Expedition	P255/70R16 109S	Gen/Good/Fire	B	S = 112	30/35	108	103	5F/9R
	P265/70R17 113S	Good/Fire	B	S = 112	30/35	108	103	5F/9R
Navigator	P245/75R16 109S	Continental	B	S = 112	30/35	108	103	5F/9R
	P255/75R17 113S	Continental	B	S = 112	32/38	110	103	7F/9R
F250 HD	LT235/85R16E	Gen/Good	NR	R = 106	50/80	106	93	13
	LT265/75R16E	Firestone	NR	R = 106	45/70	106	93	13
F350	LT215/85R16E	Firestone	NR	R = 106	50/80	106	93	13
	LT235/85R16E	Gen/Good	NR	R = 106	60/80	106	93	13
	LT265/75R16E	Firestone	NR	R = 106	50/80	106	93	13
F450/550	225/70R19.5F	General	NR	M = 81	70/95	81	85 (unloaded)	-4 *
Excursion	LT265/75R16D	Firestone	NR	R = 106	45/55	106	95	11
Contour	205/60R15 91V	Fire/Mich	A	V = 149	31/34	142	115 (@120 amb)	27
Mustang	245/45R17Z	Goodyear	A	Z = 149	30/30	143	145	-2 *
Taurus	P205/65R15 92H	Bridgestone	A	H = 130	35/35	130	109	21
Windstar	P215/70R15 97H	Goodyear	A	H = 130	35/35	130	?	?
Ford/Mercury Police	P225/60R16 97H	Michelin	A	H = 130	32/32	128	120(a)/124(e)	4
	P225/60R16 97V	Goodyear	A	V = 149	35/35	149	132	17
Lincoln LS	P235/50R17 95V	Firestone	A	V = 149	30/30	142	140	2
Town Car	P225/60R16 97H	Michelin	A	H = 130	32/32	128	120(a)/124(e)	4
Continental	-Vehicle not sent to GCC-							

* - Tire has been tested per Ford procedure at Vmax of vehicle for 30 minutes, even though speed rating and pressure dictate a lower speed on the tire.
# - Not sure this tire goes into GCC market
a - aerodynamic limited
e - electronically limited
@ - I have sent a note to U204 group advising that a different tire, higher tire pressure or lower vehicle top speed be investigated.

Allan Rauner x-42821

3. PROBLEM INVESTIGATION/VERIFICATION DATA

A. Lab tests:

Firestone experts indicated that more samples to be tested at their laboratories were not required.

B. Vehicle tests:

In our (FOV, Firestone) field evaluation a total of 37 Explorer were examined without locating a sample that could reproduce the exact failure. There were damages done to the tires such as: superficial or on the steel belt punctures, under inflated tires, bad repairs, damage on the side walls etc, but not tread separation.

C. Plant / Supplier reports:

Supplier (Bridgestone / Firestone of Venezuela) has been contacted in Venezuela and U.S. about Venezuelan incidents. A team was formed in order to perform a field survey, this team involved Firestone Venezuela/ USA and Ford representatives. The conclusions from Firestone USA are:

.- It was not detected any defect with the tire.

.- Low inflation operating conditions caused by any of the following can cause damage to the tire when it continues to be run with inadequate pressure:

- Punctures, cuts which cause slow leaks and tire continues to be used with low inflation
- Poor tire maintenance
- Improper repairs.

They inspect 56 P255/70 R16 Wilderness AT and 76 P235/75 R15 Wilderness ATX tires.

D. Quality Indicators System: None.

E. Field reports: an approximate of 50 from Venezuela. All the reported cases have occurred in Venezuela.

F. Parts sales: Service changes are handled through Firestone dealers through Job'1 to March/2000. They are presently handled through Goodyear & Ford dealers.

G. Number of accidents/fines and injuries: There have been an estimated of fifty accidents. The Venezuelan media has attributed a number of fatalities and injuries to tire tread separation. We have not confirmed the cause of any of these accidents.

4. ACTIONS TAKEN IN PRODUCTION; INTERIM (CONTAINMENT) AND/OR PERMANENT

Interim corrective actions:

A modified Firestone tire Venezuelan made with a higher speed rating (S), cap-ply reinforcement and polyester materials for construction was developed. The use of the new tire in production was on the 06/15/99 (DOT-259). Additionally, the tire

inflation pressure was recommended to be of 30-32 psi as of 5/01/99 (previously set to 26 front – 28 rear psi for FOV vehicles only).

FOV Engineering Department released on September/99 for the 2000 MY Explorers and F-150 a Goodyear Wrangler RTS tire in order to improve our image and customer satisfaction. All the technical requirements and tests were completed successfully.

A. Notification: **Release number:** 98-229-2, 98-228-2, 98-050-6, 96-023-9 of 06/01/99 for the Wilderness Firestone tire.
99-209, 98-122-5, 99-208, 99-001-4 for the Goodyear Wrangler RTS tire on 08/25/99.

B. **WERS alert number:** None.
C. **Component batch issues:** None

5. VERIFY EFFECTIVENESS OF CORRECTIVE ACTIONS

A. The interim corrective tires were bench tested by Firestone at 160 KPH (100 MPH) for a period of four continuos hours without failure.

6. ESTIMATED PRODUCTION AND PROBLEM STATISTICS (MAGNITUDE OF CONCERN) Venezuela/Colombia & Ecuador

VEHICLES AFFECTED	ASSEMBLY PLANTS	VEHICLE PRODUCTION DATES	POTENTIALLY NUMBER OF UNITS	AFFECTED UNITS ESTIMATED PERCENTAGE OF VEHICLES THAT CONTAIN THE CONDITION
Explorer	FOV	Job1 96MY through 99MY	34,868	unknown
F-150	FOV	98 MY through some 99MY	4,456	unknown
BU/ Imported	USA	98 MY through some 99MY	488	unknown

7. AFTERMARKET PARTS

A. The Firestone tire was released on October 1995 until 06/15/99. Ford Motor de Venezuela, S.A. does not stock tires for service. Firestone dealers actual stock is unknown.
B. Currently FOV Dealers are selling Goodyear tires.

Firestone must determine whether they want to purge their inventory of tires at their distributor and tire stores in Venezuela.

8. ASSESMENT OF EFFECT ON VEHICLE OPERATION

In the event that a tire tread separates while the vehicle is travelling at extremely high rates of speed, driver may have reduced or complete loss of steering control.

9. DESCRIPTION OF CONCERN SOLUTION AND PARTS REQUIREMENTS (FIELD SERVICE ACTIONS)

Short term actions:

The Engineering Department released a Goodyear tire in order to improve our image and customer satisfaction. All the technical requirements and tests are completed successfully.
Vehicles sold between job#1 '96 and '98 will be replacing the five (5) tires. Four of them a full size tire and the spare for another Goodyear but R15. On '98 and '99 MY vehicles we will be replacing all five (5) tires because the spare tire is the same size and construction as the four road tires. FOV will not be changing tires on any vehicle that comes in to our Dealers and has had the tires changed from Firestone to some other brand tire.

2000 MY Explorer produced in Venezuela and exported to Colombia and Ecuador are fitted with the Goodyear tires.

Long term actions:

A. No long term prime actions has been assessed yet.
B. Test processes, plant capacity, market wants and other factors will be thoroughly considered in developing a long term action.

10. PROGRAM PARTS SIGN OFF/AVAILABILITY

The Goodyear 255/70 R16 (black letters) part number 985K-1508-AA, 255/70 R16 (white letters) part number 995K-1508-BA, 235/75 R15 (white letter) part number F87A-1508-K3B and 235/75 R15 (black letters) part number 995K-1508-AA was released on 08/24/99. These tires were fully approved and PPAP released on the 10/22/99 and 11/11/99 respectively. No tooling is needed for this part number.
Part availability schedule: In production.

11. SUPPLIER INVOLVEMENT

A. The name of the causal part supplier:

Bridgestone/Firestone Venezolana, C.A.
Carretera Nacional Valencia Los Guayos,
Valencia-Edo. Carabobo.
Venezuela.
Pedro Martinez, Sales Manager for Original parts 011-58-41-407777

B. This condition is component-related, and is specifically related to the tire usage in the Venezuelan market.

C. Percentage of the root cause contributed by the supplied component: TBD.

D. Deliver copy of this paper to tire buyer Martin Cadena when completed and approved.
E. Bridgestone / Firestone: LF177 , Prefit code: 6062
GOODYEAR: LG214, Prefit code: 6066
F. Miguel Ruiz MRUIZ2 (Manager) / Martin Cadena MCADENA (Buyer).

12. FINANCIAL IMPLICATIONS

Explorer	1996	1997	1998	1999	Total
	Units	Units	Units	Units	
Venezuela	1,094	7,394	10,531	5244	24,263
Colombia	1,091	3,762	2,612	609	8,074
Ecuador	0	1,012	1,134	385	2,531
Total	2,185	12,168	14,277	6,238	34,868

PN 96	1996	1997	1998	1999	Total
Venezuela			2,441	1,325	3,766
Colombia			418	70	488
Ecuador			106	96	202
Explorer Imp.			135	353	488
Total	2,185	12,168	17,377	8,082	39,812

FIRESTONE WILDERNESS AT TIRE/ VENEZUELA/ COLOMBIA & ECUADOR 06/08/00

Estimated Percentage Change 80%		31,850 Veh.
	Metric	
Tires R15	Units	63,451
Tires R16	Units	95,797
Total Tires	**Units**	**159,248**
Tire Cost-R15	US$	
Tire Cost-R16(Avg Nat./Imp)	US$	
Total Tire Cost -R15	US$(000)	
Total Tire Cost -R16	US$(000)	
Tire Cost	**US$(000)**	
Mark-Up	US$(000)	
Total Tire Cost	**US$(000)**	
Return and Disposal of Used Tires		REDACTED
Freight & Handling Serteca GY To FOV Dealer and Adm Exp.	US$(000)	
Freight & Handling FOV Dealer to FOV Plant.	US$(000)	
Disposal Cost	US$(000)	
Total Return and Disp.of Used Tires	**US$(000)**	
Administrative, Marketing & Legal Exp.		
TOTAL TIRES	**US$(000)**	

Purchasing, Engineering, and other appropriate activities will jointly determine the extent of supplier financial responsibility. If supplier reimbursement is warranted in the field service action, purchasing will negotiate cost recovery.

13. PREVENT ACTIONS

Low inflation operating situation:

.- Firestone and Hayes Wheels performed an instructive field trip all around Ford dealers in order to teach how to evaluate tires conditions, how to inspect a tire reparation, etc.

Extended / repeated use at extremely high speed:

.- Tire SDS, ES, spec and WDMO Regulations to be modified to include the following for all vehicles going to Andina markets:

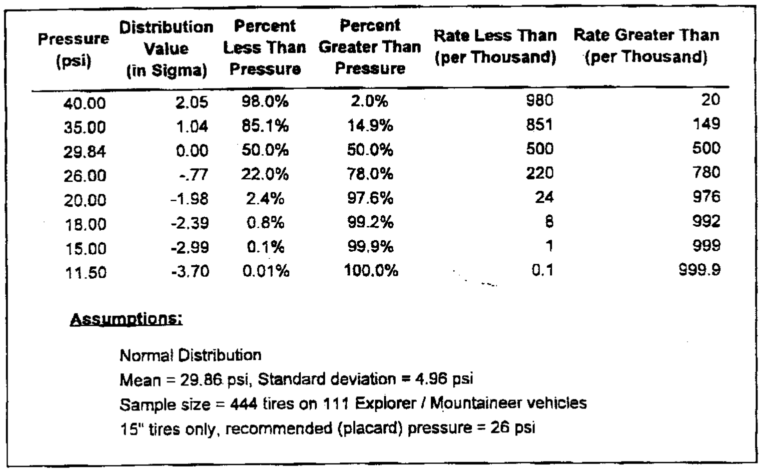
- Use tire with speed rating at least one (1) level higher than the vehicle max speed when adjusted for vehicle recommended tire pressure. If this tire construction does not exist, then speed limit the vehicle to one speed level (10KPH) below the tires speed capability when adjusted for vehicle recommended tire pressure.
- Tire should have a minimum of a "A" temperature rating by the UTQG system.
- Tire should be of a "special service" construction for extreme puncture resistance.

Overall the tire carcass useful life should be designed to last the useful life of tread wear), as a measured at TWI (tread wear indicator), (i.e. tread should be fuse to indicate when the tire should be changed).

14. REFERENCE DATA

Edivia Caballero, ECABALL1, Service Engineer, 011-58-41-406189, Ford Motor of Venezuela.

Probablity of Indicated Pressure Levels



Pressure (psi)	Distribution Value (in Sigma)	Percent Less Than Pressure	Percent Greater Than Pressure	Rate Less Than (per Thousand)	Rate Greater Than (per Thousand)
40.00	2.05	98.0%	2.0%	980	20
35.00	1.04	85.1%	14.9%	851	149
29.84	0.00	50.0%	50.0%	500	500
26.00	-.77	22.0%	78.0%	220	780
20.00	-1.98	2.4%	97.6%	24	976
18.00	-2.39	0.8%	99.2%	8	992
15.00	-2.99	0.1%	99.9%	1	999
11.50	-3.70	0.01%	100.0%	0.1	999.9

Assumptions:

Normal Distribution
Mean = 29.86 psi, Standard deviation = 4.96 psi
Sample size = 444 tires on 111 Explorer / Mountaineer vehicles
15" tires only, recommended (placard) pressure = 26 psi

tire pressure survey
8/7/2000

JIM TRAVERS
4. PAGES

Dealership: Cerritos Ford State: CA

TIRE PRESSURE SURVEY

As part of its ongoing research into consumer vehicle usage practices, Ford Motor Company needs your help in recording the following information on tire pressure. This will help us learn how closely vehicle owners maintain their tire pressure at the recommended pressure levels. We need the following data on 40 Ford Motor Company cars and light trucks.

Cerritos Ford

				Tire Pressure Readings				
Vehicle Model	Year	Mileage	Tire Size	Front Right	Front Left	Rear Right	Rear Left	Tire type
1. F150	97	78,966	P265/70 R16 Bridgestone Dueler AT	32	30	22 – looks like spare Goodyear 255/70 R16	31	
2. Escort Wagon	94	60,487	P185/60 R14 Cooper Cobra G/T	35	35	35 *	34 [illegible]	
3. Mustang	90	12,706 indicated	P205/70 R14 Bridgestone Potenza	34	35	31	30	
4. Crown Vic	91	59,645	P215/70 R15 Michelin Radial XW	76	34	35	34	
5. Taurus	99	16,121	205/65 R15 General Ameri G4S	24	23	44	29	
6. Expedition	97	51,402	~~P265~~ P255/70 R16 Goodyear Wrangler	31	33	26	26	
7. Mustang	98	43456	245/45ZR17 Goodyear Eagle	33	35	26	34	
8. Explorer	96	100465	235/75 R15 [illegible]	31 [illegible]	31 [illegible]	32 [illegible]	35 [illegible]	
9. Escort	99	3,599	185/60 R15 [illegible]	27	27	25	26	

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	Date # of pages ▶ 8
To Rosemary O'Malley	From Jim Travers
Co./Dept.	Co.
Phone #	Phone #
Fax # 313-248-8585	Fax #

Dealership: Cerritos Ford

State: CA

Vehicle Model	Year	Mileage	Tire Size	Front Right	Front Left	Rear Right	Rear Left
10. Contour	97	75277	185 70 R14 Jupiter	20	26	37	50+
11. Windstar	95	82618	205 70 R15 Goodyear	45	43	45	43
12. Windstar	00	15,000	215 70 R15 General	31	32	31	31
13. F150	97	116921	225 70 R16 Goodyear	28	26	30	27
14. Explorer	98	34156	235 75 R15 Firestone	31	30	30	30
15. Explorer	96	70080	235 75 R15 Firestone	28	30	15	30
16. Expedition	98	39 455	255 70 R16 Goodyear	35	29	19	29
17. Expedition	98	34752	255 70 R16 General	34	32	30	31
18. F150	96	39145	255 70 R16 Goodyear	32	31	37	37
19. Explorer	97	60781	235/75 R15 Dayton	25	29	28	29
20. Taurus	99	17819	205 65 R15 General	34	34	34	19

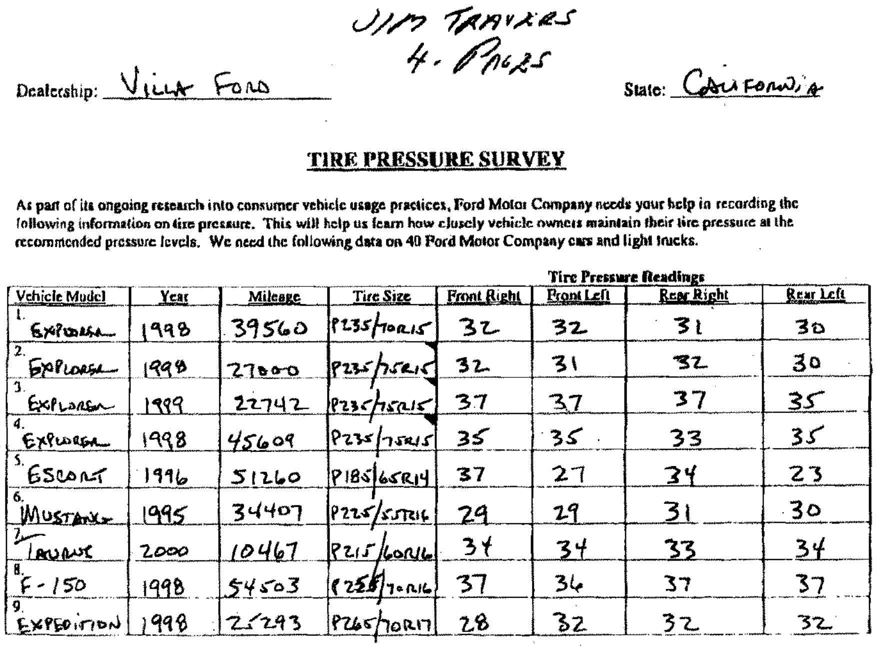
Dealership: Cerritos Ford

State: CA

	YR	Mileage	Size	RF	LF	RR	LR
21. Mustang	95	245 45 ZR 17 MICHELIN	48564 miles	31	29	37	34
22. Taurus	93	116861	205 70 R14 Remington	25	25	31	20
23. Windstar	98	24696	215 70 R15 GOODYEAR	50+	30	32	24
24. T-BIRD	94	42426	215 70 R15 [illegible]	21	19	20	18
25. Mustang	95	88054	205 65 R15 AKURET	39	37	25	38
26. Expedition	98	25202	255/70 R16 GOODYEAR	35	34	34	35
27. Windstar	95	77979	205 70 R15 Futura	26	35	31	35
28. Windstar	98	49670	215 70 R15	32 Winston	21 MICHELIN	27 Kelly	27 Kelly
29. Windstar	95	68900	215 70 R15 Kingland	32	32	29	32
30. Probe	93	76709	225 50 ZR 16 PIRELLI	30	26	25	32
31. Explorer ~~Mustang~~	98	34187	235 75 15 Firestone ~~Goodyear~~	31	31	31	31
32. TBIRD	96	45105	215 70 R15 Firestone	24	24	20	25

Dealership: Cerritos Ford   State: CA

Model	Yr	Mileage	Tire Size	RF	LF	RR	LR
33. Contour	97	18615	215 60R15 Firestone	32	33	38	42
34. Mustang	98	43476	205 65R15 Remington	32	30	32	31
35. Taurus	91	53324	205 70R14 Firestone	34	28	34	24
36. Focus	00	13581	195 60R15 Firestone	38	35	34	34
37. Aerostar	89	151203	205 75R14 Commander	22	26 Cornell	35	27
38. Windstar	00	2314	215 70R15 Goodyear	28	28	28	28
39. Expedition	97	30366	255 70R16 Remington	34	36	32	35
40. Explorer	95	64644	235 75R15 Firestone	35	35	35	34



JIM TRAVERS
4. PAGES

Dealership: VILLA FORD

State: CALIFORNIA

TIRE PRESSURE SURVEY

As part of its ongoing research into consumer vehicle usage practices, Ford Motor Company needs your help in recording the following information on tire pressure. This will help us learn how closely vehicle owners maintain their tire pressure at the recommended pressure levels. We need the following data on 40 Ford Motor Company cars and light trucks.

				Tire Pressure Readings			
Vehicle Model	Year	Mileage	Tire Size	Front Right	Front Left	Rear Right	Rear Left
1. EXPLORER	1998	39560	P235/70R15	32	32	31	30
2. EXPLORER	1998	27000	P235/75R15	32	31	32	30
3. EXPLORER	1999	22742	P235/75R15	37	37	37	35
4. EXPLORER	1998	45609	P235/75R15	35	35	33	35
5. ESCORT	1996	51260	P185/65R14	37	27	34	23
6. MUSTANG	1995	34407	P225/55R16	29	29	31	30
7. TAURUS	2000	10467	P215/60R16	34	34	33	34
8. F-150	1998	54503	P255/70R16	37	36	37	37
9. EXPEDITION	1998	25293	P265/70R17	28	32	32	32

Dealership: VILLA FORD

State: CALIFORNIA

Vehicle Model	Year	Mileage	Tire Size	Front Right	Front Left	Rear Right	Rear Left
10. T-BIRD	1996	69845	P225/70R15	33	34	32	35
11. RANGER EV	1999	485	P225/70R15	49	49	49	20
12. RANGER	1998	20849	P225/70R15	33	34	33	34
13. ASPIRE	1997	75760	P185/75R13	31	33	24	25
14. WINDSTAR	1996	34062	P215/70R15	40	33	28	24
15. CONTOUR	1998	36991	P205/60R15	23	24	25	25
16. PROBE	1992	49679	P205/60R15	33	34	34	34
17. TAURUS	1995	94398	P205/65R15	34	34	35	34
18. T-BIRD	1997	22054	P215/70R15	35	35	34	34
19. CRN. VIC ?	1999	12442	P225/60R16	40	43	40	40
20. WINDSTAR	1995	41834	P215/70R15	31	31	30	32

Dealership: Fairway Ford

State: California

MODEL	YEAR	MILEAGE	TIRE SIZE	RF	LF	RR	LR
21. Taurus	1996	41576	P205/65R15	38	36	35	35
22. E-150	1999	25483	P235/75R15	40	40	40	40
23. Contour	1995	74976	P205/60R15	30	31	30	30
24. E-150	1996	28898	P235/75R15	37	37	37	37
25. Escort	1997	45759	P185/65R14	31	32	35	39
26. Taurus	1992	81354	P205/65R15	31	30	38	36
27. Expedition	1998	37562	P255/70R16	38	35	40	37
28. Aspire	1996	51230	P175/70R13	31	33	31	32
29. Windstar	1996	43719	P215/70R15	31	32	32	31
30. E-350	1998	69421	LT245/75R16	45	41	40	40
31. Ranger	1995	81879	LT235/75R15	33	33	34	34
32. Continental	1990	108182	P205/70R15	30	30	26	30

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Dealership: FAIRWAY FORD **State:** CALIFORNIA

MODEL	YEAR	MILEAGE	TIRE SIZE	RF	LF	RR	LR
33. MARK VIII	1993	25518	P225/60R16	33	35	38	40
34. FOCUS	2000	~~43~~ 128	P185/65R14	33	33	32	~~36~~ 32
35. EXPLORER	1999	11567.	P235/75R16	36	31	31	31
36. T-BIRD	1996	59203.	P215/70R15	35	43	28	40
37. EXPLORER	1998	56513.	P235/75R16	34	33	33	33
38. RANGER	1998	35172	P235/70R16	32	32	29	32
39. RANGER	1999	9058	P225/70R15	32	32	31	32
40. EXPLORER	1997	45209	P235/75R15	35	38	35	38

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Dealership: Westway Ford

State: Texas

TIRE PRESSURE SURVEY

As part of its ongoing research into consumer vehicle usage practices, Ford Motor Company needs your help in recording the following information on tire pressure. This will help us learn how closely vehicle owners maintain their tire pressure at the recommended pressure levels. We need the following data on 40 Ford Motor Company cars and light trucks.

				Tire Pressure Readings			
Vehicle Model	Year	Mileage	Tire Size	Front Right	Front Left	Rear Right	Rear Left
1. 2000 Expl. 4ZC26070	2000	2585	P235 75R15	34	34	34	34
2. Expl. WZA96727	1998	35195	" "	26	32	25	25
3. Expl 42A04232	2000	16307	P235-70-R16	30	30	30	30
4. Expl 2A32456	1998	47240	P235-70R15	35	36.	35	35
5. Expl 4UA54736	2000	14063	P235 70R-15	32.	32.	32.	32
6. Expl 1UZ37632	1998	47134	P235 75R-15	31	29	31	31
7. Expl 42C15115	2000	1257 ~~[illegible]~~	P235-75R-15	27	27	27	27
8. Expl 4UB B8420	2000	1076.	P235-75R-15	27	26.5	27	27
9. Expl 42096176	2000	2373	P235-75R15	26.	26.	26.	26.

Dealership: Westway State: Tx

Vehicle Model	Year	Mileage	Tire Size	Front Right	Front Left	Rear Right	Rear Left
10. Expl X2B6104	1999	26391	P235-70-15	31	43	32	33
11. Expl WUC65767	1998	45178	P235-70-15	27	27	30	29
12. Expl W2C23378	1998	28648	P235-70-15	22.	33	24	22
13. Expl XUA07993	1999	26320	P235-70-15	27	26.	26.	27
14. Expl X2A18310	1999	32599	P235-70-15	29	28	29	29
15. X0C80629	1999	20605	P235-70R-15	30	30	30	30
16. WUB71697	1998	36490	P235-70-15	32	32	34	29
17. WUC66041	1998	38445	P235-70-15	30	30	32.	30
18 W2C13330	1998	33360	P235-70-16	34	32	32	32.
19 Y2B64146	1999	23146.	P235-70-16	28	31	29	30
20. X2377875	1999	20784	P235-70-16	26.	27	27	28

11 Explorers

Dealership: Westway

State: Tx,

VEH MOD	YEAR	MILEAGE	TIRE SIZE	FR	FL	RR	LR.
21. 42B86305	2000	3490	P235-70-16	26.	27	27	27
22. W2401210	1997	57543	P225-70-15	30	25	35	34
23. YLA23726.	1995	22958	P255-70-16.	34	31	30	31
24. WZA28773	1997	58129	P235-70-16.	36.	31	34	31
25. X2A51607	1999	16801	P235-70-15	32	33	26.	27
26. WUB10400	1997	47899	P235-70-15	29	28	25	29
27. 42A20415	2000	20554	P235-70-15	29	29	16.	30
28 WUC73523	1998	21625	P235-70-15	38	38	36	37
29. WUS36375	1998	27752.	P235-70-16	19	35	36	30
30. 42S03750	2000	9204	235-70-16.	28	28	28	28
31 X2B38064	1999	51148	P235-70-16.	31	29	30	25
32 XUJ42022	1999	26558	P235-70-15	26.	27	27	34

Dealership: Westway

State: Tx

All
xplorer

VIN mod	YEAR	MILEAGE	TIRE SIZE	RF.	LF	RR	LR
33. WZ062780	1998	22534	P235-70-15	51	29	29	28
34. XUJ43340	1999	29299	P235-70-15	36.	36	20	35
35. Explorer WZB56226	1998	31319	P235 70-15	29	27	29	27
36. Explorer YUA08697	2000	13057	P235-70-15	33	32	32	32
37. Explorer XUC40102	1999	9633	235-15	25	30	26	28
38. YZA14264	2000	7021	235-15	28	30	28	26
39. XZB82989	1999	6729	235-15	29	28	30	32
40. Explorer XUC33627	1999	15176	235-15	32	32	33	31

Dealership: Baillargeon State: TX

TIRE PRESSURE SURVEY

As part of its ongoing research into consumer vehicle usage practices, Ford Motor Company needs your help in recording the following information on tire pressure. This will help us learn how closely vehicle owners maintain their tire pressure at the recommended pressure levels. We need the following data on 40 Ford Motor Company cars and light trucks.

				Tire Pressure Readings			
Vehicle Model	Year	Mileage	Tire Size	Front Right	Front Left	Rear Right	Rear Left
1. Expl	95	69,938	235/75/15	24	23	26	24
2. Expl	98	49,527	255/70/16	29	29	29	29
3. Expl	97	42,289	235/75/15	24	32	29	27
4. Expl	98	118,941	255/70/16	37	36	37	35
5. Exc	00	3,090	265/75/16	49	48	49	48
6. Expl	96	57,564	235/75/15	29	30	10	30
7. Exped	98	46,808	255/70/16	32	32	33	31
8. Expl	94	81,016	235/75/15	31	29	30	30
9. Expl	99	18955	255/70/16	25	26	25	25

Dealership: Baillargeon State: Tx

Vehicle Model	Year	Mileage	Tire Size	Front Right	Front Left	Rear Right	Rear Left
10. Expl.	98	30,152	255/70/16	8	24	26	32
11. Expl	96	62,508	235/75/15	30	29	19	29
12. Exped	99	1,628	255/70/16	35	38	38	30
13. Expl.	98	28,678	235/75/15	25	32	29	29
14. Expl	96	43,966	235/75/15	31	23	28	28
15. Exped	99	31,007	265/70/17	35	36	36	32
16. Expl	95	79,803	235/75/15	23	25	24	27
17. Exped	99	23,421	255/70/16	30	30	30	28
18 Ranger	95	134,800	225/70/14	35	32	33	32
19 Expl	99	27,073	235/75/15	30	32	30	31
20 Expl	99	27,421	235/75/15	40	31	31	31

Dealership: Boillargeon State: TX

21. Expl	98	43,107	235/75/15	30	30	32	31
22. Expl	98	59,773	235/75/15	28	29	28	29
23. Expl.	95	84,131	205/75/15	38	37	36	36
24. Expl	98	20,309	235/75/15	26	28	25	26
25. Expl.	98	31,349	235/75/15	27	30	29	29
26. Expl	94	51,385	235/75/15	25	24	20	20
27. Expl.	98	25,026	235/75/15	26	28	31	27
28. Expl	00	4659	255/70/16	31	31	31	15
29. Expl	00	5138	235/75/15	28	28	27	26
30. Expl	00	356	255/70/16	28	29	28	29
31. Expl	00	5452	235/75/15	26	27	28	26
32. Expl SpTdc	00	2991	255/70/16	35	35	38	38

Dealership: Baillargeon State: ______

33. Expl	98	49,927	255/70/16	30	30	30	30
34. Expl	00	2946	237/75/15	28	29	29	30
35. Exped	99	21,421	255/70/16	40	40	40	42
36. Expl.	00	2,032	235/75/15	30	28	30	28
37. Expl.	99	17,026	235/75/15	23	25	23	23
38. Expl.	00	840	235/75/15	30	30	30	30
39. Expl.	99	13,609	235/75/15	28	30	30	24
40 Expl.	98	31,076	235/75/15	24	22	25	24

SEP 03 2000 14:19 FR WHQ FRONT LOBBY DESK 313 337 9845 TO 912022255288 P.18/25

FR FORD CUST SERVICE 407 875 7510 TO 82498585 P.02/29

FROM : FAX NO. : Jul. 28 2000 03:22PM P1

JUL 27 2000 FR FORD CUST SERVICE 407 875 7510 P.02/05

Del Ray L-M

Dealership: Marcone Ford of Margate (Mullinax South) State: Florida

TIRE PRESSURE SURVEY

As part of its ongoing research into consumer vehicle usage practices, Ford Motor Company needs your help in recording the following information on tire pressure. This will help us learn how closely vehicle owners maintain their tire pressure at the recommended pressure levels. We need the following data on 40 Ford Motor Company cars and light trucks.

Vehicle Model	Year	Mileage	Tire Size	Tire Pressure Readings Front Right	Front Left	Rear Right	Rear Left
1. Mountaineer	98	33623	P235/75R15	32	30	28	30
2. Explorer	98	24145	P235/75R15	32	32	32	32
3. Explorer	95	45897	P235/75R15	32	32	32	32
4. Explorer	00	10220	P235/75R15	32	32	32	32
5. Mountaineer	00	4999	P235/75R15	22	22	24	24
6. Expedition	99	25770	P275/60R17	30	30	32	32
7. Explorer	98	59995	P255/75R15	30	30	28	30
8. Excursion	00	2317	LT265/75R16	30	30	30	30
9. Explorer	99	18365	P235/75R15	32	32	28	30

JUL 27 2000 10:24

Dealership: Marrone Ford of Margate State: Florida

Vehicle Model	Year	Mileage	Tire Size	Front Right	Front Left	Rear Right	Rear Left
10. Explorer	96	67141	P235/75R15	26	26	28	28
11. Explorer	98	23981	P255/75R15	28	28	28	28
12. Explorer	99	14762	P235/75R15	30	28	28	28
13. Explorer	99	21622	P235/75R15	32	32	32	31
14. Excursion	00	2765	LT265/75R16	30	30	32	32
15. Explorer	97	23140	P235/75R15	30	30	30	30
16. Explorer	98	47687	P235/75R15	32	32	34	34
17. Explorer	98	64791	P235/75R15	32	32	32	32
18. Explorer	00	4315	P255/70R16	32	32	32	32
19. F150	99	37995	P255/70R16	28	28	28	26
20. F150	99	18223	P255/70R16	34	34	30	32

Dealership: Marone Ford of Margate State: Florida

21 Expedition	99	7931	P275/60R17	30	30	32	32
22 Expedition	00	11783	P275/60R17	32	32	32	32
23 F150	99	29330	P255/70R16	30	30	26	28
24 F150	00	12705	P255/70R16	34	32	28	28
25 Explorer	00	9012	P255/70R16	32	32	32	30
26 Explorer	99	29723	P235/85R15	28	28	30	30
27 Explorer	99	16531	P235/85R15	32	32	32	32
28 Explorer	99	21333	P235/75R15	30	30	28	30
29 Explorer	00	4597	P275/75R15	32	32	32	32
30 Explorer	98	33971	P235/75R15	26	28	28	26
31 Explorer	96	13322	P235/75R15	30	30	32	30
32 Explorer	97	55810	P235/75R15	32	32	32	29

-3-

Dealership: MARGATE L-M

State: FLORIDA

33. NAVIGATOR	00		P245/75R16	32	32	34	34
34. NAVIGATOR	99		P265/60R17	28	27	28	28
35. NAVIGATOR	99		P265/60R17	28	28	34	33
36. MOUNTAINEER	01	12621	P235/75R15	32	32	32	32
37. MOUNTAINEER	99	30974	P235/75R15	32	32	30	29
38. EXPLORER	99	28731	P235/75R15	29	30	30	30
39. MOUNTAINEER	99	22239	P235/75R15	32	32	30	30
40. NAVIGATOR	00		P245/75R16	30	30	32	32

Dealership: Don Reid

State: Florida

TIRE PRESSURE SURVEY

As part of its ongoing research into consumer vehicle usage practices, Ford Motor Company needs your help in recording the following information on tire pressure. This will help us learn how closely vehicle owners maintain their tire pressure at the recommended pressure levels. We need the following data on 40 Ford Motor Company cars and light trucks.

				Tire Pressure Readings			
Vehicle Model	Year	Mileage	Tire Size	Front Right	Front Left	Rear Right	Rear Left
1. Explorer	96	72216	235-70-16	28	25	23	30
2.	97	70673	225 75-15	30	31	26	29
3.	97	24746	235-75-15	32	32	32	30
4.	98	17241	235-75-15	36	40	45	31
5.	96	61051	235-75-15	37	40	37	38
6.	01	4920	235-75-15	31	30	29	31
7.	95	69037	235-75-15	27	29	18	18
8	94	79469	235-75-15	32	35	33	35
9.	97	37312	235-75-15	25	30	28	28

Dealership: Don Reid

State: Florida

Vehicle Model	Year	Mileage	Tire Size	Front Right	Front Left	Rear Right	Rear Left
10. Explorer	97	30906	235-75-15	27	23	22	23
11.							
12.							
13.							
14.							
15.							
16.							
17.							
18							
19.							
20							

Dealership: Greenway Ford State: Florida

TIRE PRESSURE SURVEY

As part of its ongoing research into consumer vehicle usage practices, Ford Motor Company needs your help in recording the following information on tire pressure. This will help us learn how closely vehicle owners maintain their tire pressure at the recommended pressure levels. We need the following data on 40 Ford Motor Company cars and light trucks.

Vehicle Model	Year	Mileage	Tire Size	Tire Pressure Readings Front Right	Front Left	Rear Right	Rear Left
1. Explorer	94	84810	235/75/15	23	24	22	26
2.	98	53443		30	32	34	30
3.	97	24562		25	26	25	26
4.	96	67762		29	29	29	30
5.	94	102897		28	28	28	30
6.	97	32050		20	21	22	21
7.	97	18968		30	30	32	29
8	97	61175		29	32	29	30
9 ↓	00	5660	↓	60	32	52	44

SEP 03 2000 14:21 FR WHQ FRONT LOBBY DESK 313 337 9845 TO 912022255288 P.25/25
JUL 28 2000 15:55 FR FORD CUST SERVICE 407 875 7510 TO 82468585 P.09/09
JUL 27 '00 17:01 FR FCSD OWNER RELATIONS 407 875 7575 TO [illegible] P.02/05
JUL-27-00(THU) 10:09 CSO / FIELDOPS TEL:313 248 8585 P 002

780

Dealership: Greenway Ford State: Florida

TIRE PRESSURE SURVEY

As part of its ongoing research into consumer vehicle usage practices, Ford Motor Company needs your help in recording the following information on tire pressure. This will help us learn how closely vehicle owners maintain their tire pressure at the recommended pressure levels. We need the following data on 40 Ford Motor Company cars and light trucks.

				Tire Pressure Readings			
Vehicle Model	Year	Mileage	Tire Size	Front Right	Front Left	Rear Right	Rear Left
1. Explorer	99	24534	235/75/15	18	24	33	24
2. "	98	35147	"	29	30	29	29
3.							
4.							
5.							
6.							
7.							
8.							
9.							

Ford Motor Company

L. W. Camp, Director
Automotive Safety Office
Environmental and Safety Engineering

August 18, 2000

Ms. Kathleen C. DeMeter, Director
Office of Defects Investigation
Safety Assurance
National Highway Traffic Safety
Administration
400 Seventh Street, S. W.
Washington, D.C. 20590

Dear Ms. DeMeter:

Subject: PE00-020:NSA-12tad

This is in partial response to the agency's May 10, 2000 letter requesting information concerning allegations of "tire failures on Firestone ATX, ATXII, and Wilderness tires" installed as original equipment on certain 1991 through 2000 model year Ford vehicles including Ranger (Mazda B2000), Explorer (Mazda Navajo), Mountaineer, F-150, Bronco, and Expedition vehicles.

Ford's June 19, 2000 letter requested an extension of time for our response to portions of your inquiry. During a July 28, 2000 telephone conversation between the Agency's Richard Boyd and Ford representatives, a schedule was outlined and agreed upon for Ford to partially respond to your various requests. A letter from the Agency, dated August 2, 2000, granted an extension to August 18, 2000 for certain portions of the inquiry. Ford will be contacting Mr. Boyd of you staff on August 21, 2000 to discuss an agreeable schedule to provide further analysis of owner and field information that have been provided in Ford's various responses to this inquiry.

Efforts to provide further response to your requests are ongoing.

Sincerely,

LWCamp

Attachment

W:/jhr/pe00020c5.doc
jhr/zp

330 Town Center Drive Dearborn Michigan 48126-2738 USA

ATTACHMENT
August 18, 2000

FORD'S RESPONSE TO PE00-020

Ford's response to this Preliminary Investigation was prepared pursuant to a diligent and good faith search for the information requested. While we have employed our best good faith efforts to provide responsive information, the breadth of the Agency's request and the requirement that information be provided on an expedited basis makes this a difficult task. We nevertheless have made every effort to provide thorough and accurate information and would be pleased to meet with Agency personnel to discuss any aspect of this inquiry.

The scope of Ford's investigation conducted to locate responsive information focused on Ford employees most likely to be knowledgeable about the subject matter of this inquiry, and to reviewing Ford files in which responsive information ordinarily would be expected to be found and to which Ford ordinarily would refer, as more fully set forth elsewhere in this response. Ford notes that although electronic information was included within the scope of its search, Ford has not attempted to retrieve from computer storage media electronic files that were overwritten or deleted. As the Agency is aware, such files generally are unavailable to the computer user even if they still exist and are retrievable through expert means. To the extent that the Agency's definition of Ford includes suppliers, contractors and affiliated enterprises for which Ford does not exercise day-to-day operational control, we note that information belonging to such entities ordinarily is not in Ford's possession, custody or control. Also, Ford has construed this request as pertaining to vehicles manufactured for sale in the United States.

Complete or partial answers or updated information in response to your specific Request Nos. 3, and 5 through 17 are set forth below. As requested, after each numeric designation, we have set forth verbatim the request for information, followed by our response. Unless otherwise stated, Ford has undertaken to provide responsive documents dated up to and including May 10, 2000, the date of your inquiry. Ford has searched business units and/or affiliates within certain areas within the following divisions for responsive documents: Asia Pacific Operations and Associations, Business and Product Strategy, Corporate Finance, Environmental and Safety Engineering, Ford Automotive Operations, Ford Customer Service Division, Ford Division, Ford of Australia, Ford of Venezuela, Large and Luxury Vehicle Center, Manufacturing Executive Office, Marketing Operations, Marketing and Office of the General Counsel, Public Affairs, Product Development Staff, Process Leadership, Purchasing, Powertrain Operations, Quality, Research and Vehicle Technology, Small and Medium Vehicle Center, Truck Vehicle Center, and Visteon.

Request No. 3

State the number and produce copies of the following (with the exception of those related solely to uneven tire wear), and all documents relating thereto, from all sources, of which Ford is aware and which relate or potentially relate to the alleged defect in the subject tires installed as original equipment on the subject vehicles:

a. owner/fleet complaints;
b. field reports;
c. crash/incident reports;
d. subrogation claims;
e. lawsuits; and
f. arbitration proceedings.

Produce each of these categories of documents grouped by tire model name; DOT tire identification number (as required by 49 CFR Part 574); tire size; and vehicle make, model, and model year. For each incident and/or document, provide the information specified in Table 1 below.

Table 1. Complaint Information to be Provide In Response to Question 3.

Incident information	Owner Information	Tire Information	Vehicle Information
Ford's report identification number	Date of complaint	Tire model name	Make
Complete description of the complaint or incident	Owner name	10 digit DOT number	Model
Date of failure	Owner address	Part/stock number	Model year
	Owner phone number	Tire build date	Build date
	Identify the location of consumer contact. For example: - Ford - Ford dealership - Tire store - Etc.	Manufacturing plant where the tire was produced	17 digit vehicle identification number (VIN)
	If a tire store furnished Ford with the complaint, identify the store by name, address and phone number		Vehicle mileage at time of incident.

> If there are more than 200 records, provide the requested information in Lotus 123, 97 version format. Provide a separate spreadsheet for each category "a" through "f". Arrange the records on the spreadsheet in chronological order, by incident date. For each responsive record, provide the information requested in separate columns within a single row consistent with the example provided in Appendix B. If Lotus 123, version 97 software is not available to Ford, provide the requested information in an equivalent spreadsheet program format that can readily be converted to Lotus 123, version 97 format, or in ASCII fixed length electronic format.

Answer

Ford's July 24, 2000 response provided copies of owner reports that were the result of our MORS database search as described in Appendix I of that response. Our July 24, 2000 response also stated that Ford would be providing additional information for certain of those MORS reports designated as "Legal Contacts" in a later submission. The additional information that has been located from the Litigation Prevention section (please see Appendix I of Ford's July 24, 2000 response for further details) for certain of those MORS reports that have been collected is provided in Appendix I-A. These reports may or may not involve vehicles equipped with the subject Firestone tires.

This information request had an attachment which included a listing of 90 Vehicle Owner's Questionnaires ("VOQ's") and the Agency subsequently provided Ford with an additional group of 103 VOQ's for our review. Ford made inquiries of its MORS database for customer contacts and its CQIS database for comments regarding each Ford vehicle reflected on these 193 VOQ's. To the extent Ford was able to locate information related to the alleged defect on a Ford vehicle identified in those VOQ's, that information is included in Appendix I-B. Ford notes that, in some instances, it is not possible to query the databases for owner and field reports specifically corresponding to the VOQ's, such as where the VOQ does not contain the VIN, or the owner's last name and zip code.

ICCD Information Ford also performed a search of the Intensified Customer Concern Definition ("ICCD") database for potentially responsive owner reports. A description of the ICCD database and the search criteria used to identify those reports that may be considered responsive to this request are contained in Appendix I-C. The reports that were identified (meeting the word search criteria) during our search are provided in Appendix I-D. These reports may or may not involve vehicles equipped with the subject Firestone tires.

Fleet Reports Ford's Global Test Operations, Fleet Testing tests Ford Motor Company components, systems, and vehicles within the private sector, and specifically on fleet vehicles that accumulate high mileage in a short period of time. These fleets in turn provide Ford with feedback on not only the parts placed on the vehicles for testing, but often other systems or components or parts on the vehicle.

Ford searched its fleet test database to determine if any of the subject vehicles equipped with the subject tires (or unidentified tire brand) may have been provided to fleets for the purpose of obtaining further field operating experience.

The database was electronically word searched for the word "tire." To the extent that the above records reflect reference to the vehicle's tires, a listing is being provided in Appendix I-E. Because these vehicles are used for field evaluation, at times they may be equipped with non-production components. We therefore cannot determine, without further investigation, if the vehicles were equipped with production level tires at the time of the recorded incidents. Of the entries on the listing, one contains comments alleging a tread separation and one alleges a tire blow out. None of the provided reports specifically identify that the vehicle was equipped with Firestone tires.

Lawsuits and Claims Ford's August 11th response provided a preliminary lawsuit and claim list pertaining to tire allegations (categories A & B). Ford is providing the list of lawsuits and claims located and reviewed thus far in Appendix I-F. Appendix I-G contains copies of documents (previous listed in our August 11 response) from the lawsuit and claim files (categories A & B). (These lawsuits and claims may or may not involve vehicles equipped with the subject Firestone tires.) Ford notes that it was unable to locate 6 lawsuit, 11 claim, and 19 consumer breach of warranty lawsuit/claim files and therefore is unable to determine if the cases are related to the alleged defect. Ford's search for these files is continuing, and it will provide copies of any of the missing files once they are found. Further, Ford is withholding documents responsive to this request and that are contained in the lawsuit and claim files that contain information protected by the attorney-client privilege and/or work-product doctrine, and it has redacted documents responsive to this request that contain information protected by the attorney-client privilege and/or work-product doctrine. Such documents will be described in a privilege log that Ford will provide as soon as practicable. Ford is also determining whether some additional documents from the lawsuit files are privileged, and will either add those to the privilege log once privilege is verified, or it will produce those non-privileged document.

In the August 11th response to the Agency, Ford also stated that it was in the process of determining i) the documents that were produced to plaintiffs in the lawsuits and claims files that relate to the alleged defect (such claims are categorized as "A" category lawsuits and claims in the listing), and the ii) burden involved in recreating document productions that may not relate to the alleged defect. These lawsuit files tend to contain numerous design and/or manufacturing defect allegations including, but not limited to allegations involving restraints, glass, roof crush, and handling and stability. To date, Ford has recreated documents productions from six "A" category Explorer lawsuits (Donald L. Blackaller, Michael Greenwald, Vicki Hendricks, Cynthia Silva, William C. Rogers, and Gail Lockwood). We have thus far determined that approximately 40,000 pages of non-confidential documents were produced in the above six lawsuits in addition to the Explorer CD-ROM's provided to the Agency in our August 11th response. These documents appear in Appendix I-H.

Proprietary documents produced in these six lawsuits will be provided to the Agency under separate cover with a request for confidential treatment. In addition, Ford must review the production histories for all other "A" category Explorer lawsuits ano compare the document ranges to those documents already provided to the Agency so that duplicative material is not provided. Thereafter Ford must recreate the document productions in those other "A" category Explorer lawsuits and provide those documents to the Agency on a rolling basis as they are recreated. We will also determine if any of the remaining documents in the Explorer collection pertain to tires and may be responsive to this inquiry. Ford will provide responsive documents by September 8, 2000.

On August 11th, Ford stated that it was in the process of determining whether there are documents produced in "A" category Ranger lawsuits that are not contained on CD-ROM, and the burden of recreating the production histories in these cases. Ford has not completed its efforts to recreate the documents produced in those cases but will provide these documents once they have been assembled. Since the Ranger CD-ROM's were created, Ford has added approximately 1,053 documents consisting of 17,953 pages to the Ranger collection. Ford will provide the documents that were produced in "A" category Ranger lawsuits that were not on the Ranger CD-ROM's as soon as practicable. In addition, Ford will provide those documents that pertain to tires from the Ranger collection that are not on the CD-ROM's already provided to the Agency by September 8, 2000. Under separate cover, Ford will submit to the NHTSA's Office of the Chief Counsel's with a claim of confidentiality potentially responsive proprietary confidential documents that are part of the Ranger Collection on CD-ROM that were produced in "A" category lawsuits.

Ford reiterates that as a result of communications with the Agency, Ford was instructed to focus its efforts on identifying Explorer related lawsuits and claims. After the August 18th submission, Ford will then focus on providing documents produced in "A" lawsuits and claims involving other subject vehicle lines (F-150, Bronco, Expedition, and Mountaineer).

Request No. 5.

For each model of the subject vehicles, separately respond to the following warranty-related inquiries:

a. State whether the Ford warranty covers the alleged defect in the subject tires, and if so, state the terms of the warranty as they apply to the alleged defect. If the terms of the warranty that apply to tires changed at any time in or after 1990, so state.
b. Describe each type of tire failure or other problem that is covered under Ford's warranty, if any.
c. State the total number of warranty claims (with the exception of those related solely to uneven tire wear), including extended warranty claims and requests for "good will" or other adjustments

received by Ford that relate or potentially relate to the alleged defect in the subject tires, by:

1. tire model name (e.g., Wilderness AT, Wilderness HT, etc);
2. tire size;
3. vehicle model and model year;
4. tire manufacturing plant;
5. tire production date (month and year);
6. claim date (month and year); and
7. state in which claim was filed.

d. Provide a chart, in the same format as the chart in Appendix C, that is arranged in chronological order by vehicle model and model year, and that lists the following information, in columns arranged left to right in the following order, for each claim or request for adjustment (with the exception of those related solely to uneven tire wear) included in the response to question 5.c:

1. tire model name;
2. vehicle model year;
3. vehicle make and model;
4. the tire manufacturing plant;
5. the tire part or stock number;
6. the identification code for the dealer who referred the claim (with a key identifying the name, address, and telephone number of the dealer assigned each such code);
7. tire size;
8. the tire production date (month and year);
9. claim date (month and year); and
10. the vehicle build date (month and year);
11. all warranty claim codes, however denominated (e.g., as "problem codes," "trouble codes," "fault codes," or otherwise) assigned to the claim or request for adjustment by Firestone (with a key that identifies the problem associated with the code); and
12. the total number of warranty claims and adjustments.

e. For each model and size of the subject tires installed as original equipment on the subject vehicles, identify the total number of complaints and warranty claims (including extended warranty claims and requests for "good will" or other adjustments) received by Ford that relate or potentially relate to the alleged defect. Provide this information in a chart, in the same format as the chart in Appendix D, arranged in chronological order by vehicle model and model year, that lists the following information, in columns arranged left to right in the following order:

1. vehicle model year;
2. vehicle make and model;
3. vehicle manufacturing plant;
4. tire model;
5. tire size;
6. total number of vehicles sold in the United States with each
   tire model and size listed;
7. all warranty claim codes, however denominated (e.g., as "problem codes," "trouble codes," "fault codes," or otherwise) assigned to the claim or request for adjustment by Firestone (with a key that identifies the problem associated with the code); and
8. total number of warranty claims (including extended warranty claims and requests for "good will" or adjustments) for each tire model and size listed;

If there are more than 200 records in response to items (d) or (e) above, provide the requested information in Lotus 123, version 97 format. For each responsive record, provide the information requested in separate columns within a single row. If Lotus 123, version 97 software is not available to Ford, provide the requested information in an equivalent spreadsheet program format that can readily be converted to Lotus 123, version 97 format, or in ASCII fixed length electronic format. If information for each claim is provided, include additional column(s) for the state where the claim was filed and the DOT number for each claim.

Answer

5a. As stated in our June 23, 2000 response to Request No. 16 c., Ford does not warrant tires unless a tire is to be replaced as a result of a vehicle defect. The Ford and Mercury Car and Light Truck Warranty Guide provided to our customers with the purchase of a vehicle states "The tire manufacturer provides you with a separate tire warranty. Your Ford Motor Company dealership, however, may be able to address your tire service needs. You will find your tire warranty with the owner literature supplied with your new vehicle. If a tire is damaged during the Bumper to Bumper Warranty coverage period because of a vehicle defect in factory-supplied materials or workmanship, Ford Motor Company or Ford Motor Vehicle Assurance Company will replace the tire."

5b. Please refer to response to 5 a. above.

5c. Ford's Analytical Warranty System (AWS) was searched for all claims meeting the criteria described in Appendix II-A. The results of these searches were combined into a database containing 311,903 reports of which 245,189 had technician and/or customer comments. The claims with comments in the database were then word searched for purposes of identifying reports potentially involving the alleged defect using those key words agreed upon in a June 16, 2000 telephone conversation with the Agency's Ms. Terri Droneburg and provided to Ford by the Agency. A total of 10,288 possibly relevant warranty claims remained in the database after the word search. A break down of the number of reports containing each of the key words is also provided in Appendix II-A. Due to the constrained amount of time available to Ford for analysis, we were able to review 4,809 of these claims including all of those involving Explorer, Mountaineer, and Bronco. However, 49 of the reviewed claims specifically referred to tires manufactured by companies other than Firestone, and they were removed from the database.

Pivot tables showing the number of warranty claims by vehicle model, model year, claim date (month and year), and state in which the claim was filed are provided in Appendix II-B. The warranty claims represented on these tables may or may not involve vehicles equipped with the subject Firestone tires. The data you requested concerning tire model name, tire size, tire manufacturing plant, and tire production date (month and year) are not available to us at this time.

5d.,e. Because tire model, tire manufacturing plant, tire part or stock number, tire size, tire production date (month and year), the total number of vehicles sold in the United States with each tire model and size listed, and the total number of warranty claims for each tire model and size listed are not available to us at this time, we are providing the remaining information requested in "d" and "e" in the same spreadsheets. (As stated above, the claims represented in the spreadsheets may or may not involve vehicles equipped with the subject Firestone tires.) In these spreadsheets, we have provided additional information, i.e., customer and technician comments, causal base part number, warranty start date (service date), and vehicle mileage, which we believe would be useful in analyzing the warranty claims. Repairing dealer codes and states are provided in the spreadsheets; however, a key of the dealer codes containing the names, complete street addresses, and phone numbers is being forwarded as Appendix II-L under separate cover to the NHTSA's Office of the Chief Counsel. A matrix that identifies the condition codes and customer concern codes is provided with the other reference materials in Appendix II-A.

As stated in our response to Request No. 5 c., Ford reviewed 4809 of the warranty claims, and removed the 49 reports specifically reporting claims on non-Firestone tires. Those claims which Ford did review (Firestone tires and unknown brand tires) were categorized in a similar fashion as the MORS reports were categorized in our July 24, 2000 response to Request No. 3. Appendix II-C contains 220 reports alleging that a tire "blow out" occurred and do not indicate that a road hazard may have contributed to the incident. Eight claims alleging tire "blow out" that also contain reference to a road hazard or other extenuating circumstances such as foreign objects found in the tires are provided in appendix II-D. Ford has not attempted at this time to make a determination as to how many of these "blow out" reports may actually describe a major tire failure (i.e., tire structural compromise causing sudden and complete air loss because of internal tire failure or road hazard) or are simply a way of describing a "flat" tire.
Appendix II-E contains 36 claims that contain allegations that appear to relate to a tire tread separation and do not indicate a road hazard was involved. In addition, 191 reports that contain allegations of tire defects such as belt "separations" or "slippage" without comment regarding road hazard are included in Appendix II-F. Appendix II-G contains 86 reports that allege tire structural issues such as sidewall cracks, bulges, bubbles, or splits.

Appendix II-H contains 406 claims that contain allegations that are not clear as to the actual condition or possible tire failure that occurred. Included in this category are reports such as a flat tire or air loss from unknown causes with no other description, or other conditions such as flat spotting or cupping alleged to be due to a tire defect.

Appendix II-I contains 3813 claims which in Ford's opinion do not contain allegations of tire failures of the type we understand the Agency to be investigating. As you will note in your review, some of the reports do not actually involve a tire performance issue but are provided because of the word search criteria used. Others are, from the brief descriptions provided, what Ford believes to be more routine "flat" tires due to road hazard or valve stem leaks, tire wear and/or vibration issues (cupping, feathering, flat spotting, etc.), noise issues, or other more normal service issues.

Those 5479 claims which Ford has not yet had the opportunity to review, analyze, and categorize are contained in Appendix II-J. These claims may or may not involve vehicles equipped with the subject Firestone tires and in fact, may include claims that specifically state another tire brand is involved.

As requested, electronic files of the data being submitted for Request Nos. 5 c, d, and e are provided on CD in Excel 5.0 format as Appendix II-K. Electronic files of the same spreadsheets but containing dealer names and phone numbers are being provided under separate cover as Appendix II-M with a request for confidentiality to the NHTSA's Office of the Chief Counsel.

Request No. 6

> Identify and provide copies of all documents relating to all studies, surveys, and investigations, including but not limited to inquiries, tests, reports, assessments, and evaluations, from all sources, including but not limited to tire manufacturers, in Ford's possession or control, of which it is otherwise aware, that relate or may be related to the alleged defect in the subject tires. Include all pertinent documents, regardless of whether they are in interim, draft, or final form and regardless of the original purpose for gathering the information.

Answer

Ford is construing this request broadly and providing not only studies, surveys, investigations, inquiries, tests, reports, assessments, and evaluations related to the alleged defect, but also notes, correspondence, and other communications that were located pursuant to a diligent search for the requested information. The Ford business units and/or affiliates which were searched for responsive documents are as follows: Asia Pacific Operations and Associations, Business and Product Strategy, Corporate Finance, Environmental and Safety Engineering, Ford Automotive Operations, Ford Customer Service Division, Ford Division, Ford of Australia, Ford of Venezuela, Large and Luxury Vehicle Center, Manufacturing Executive Office, Marketing Operations, Marketing and Office of the General Counsel, Public Affairs, Product Development Staff, Process Leadership, Purchasing, Powertrain Operations, Quality, Research and Vehicle Technology, Small and Medium Vehicle Center, Truck Vehicle Center, and Visteon.

Appendix III-A includes such documents that are available at this time and that relate or may be related to the alleged defect in the subject tires, unless otherwise included in response to Request No. 8. Additional documents not gathered in time for this response will be provided on or before September 8, 2000.

Ford will be submitting additional information with a request for confidentiality under separate cover as Appendix III-B to the NHTSA's Office of the Chief Counsel pursuant to 49 CFR Part 512.

Ford is also in the process of determining the content of certain documents that are in foreign languages, to ascertain whether they are responsive, privileged and/or confidential. Ford will produce those documents that are relevant and not privileged as soon as practicable.

Ford has not attempted to obtain backup data to any documents created as a result of Computer Aided Engineering as such documentation would be duplicative and burdensome to obtain.

Further, Ford is withholding documents responsive to this request that contain information protected by the attorney-client privilege and/or work-product doctrine, and it has redacted documents responsive to this request that contain information protected by the attorney-client privilege and/or work-product doctrine. Such documents will be described in a privilege log that Ford will provide by September 15, 2000.

Request No. 7

> State whether Ford ever recommended any modification or change in the manufacture, design, construction, or material composition of any of the subject tires. If so, provide the following information for each such recommended modification or change:

a. The name of the tire model for which the modification or change was recommended;
b. The original tire code and/or part/stock number(s);
c. The modified tire code and/or part/stork number(s);
d. The date or approximate date (so identified) on which the modification or change was recommended;
e. A description of the recommended modification or change;
f. The reason that the modification or change was recommended;
g. Whether the recommended modification or change was implemented into production; and if so the date or approximate date (so identified) on which that occurred;
h. If the recommended modification or change was not implemented into production, the reason(s) why;
i. All written communications between Ford and Firestone regarding the recommended modification or change;
j. A description of all oral communications between Ford and Firestone regarding the recommended modification or change, including the date or approximate date (so identified) on which the communication occurred; identification (by name, position, and employing company and division or other entity) of all participants; and the substance of the communication. In responding to this request, all pertinent documents (e.g., e-mail and notes) must be reviewed.

Answer

Ford Motor Company does not recommend any modification or change in the manufacture, design, construction, or material composition of tires used on any vehicle, outside of minor appearance changes such as adding or removing lettering. On vehicle programs since 1994, it has been common practice that Ford specifies vehicle level attributes and/or performance characteristics for individual vehicle programs in a document called a "tire contract" or "tire target letter". For certain attributes, specific tire parameters, such as rolling resistance and traction, may be specified.

The tire manufacturers indicate design and other changes of specific tires by their construction codes. A summary of the latest construction code used by model year, make, cab style and drive is provided in Appendix IV. This list contains all tires that were authorized by engineering to be used on specific model years and models, but it is possible that not every tire was used in production. Note that due to the scope of your request and the requirement that information be provided on an expedited basis, we are unable to provide information regarding changes of construction code of each tire during a particular model year at this time, but this information can be provided at a later date, upon request. Specific information regarding the modification or change in the manufacture, design, construction, or material composition of these tires can be provided by the tire manufacturer, with reference to the particular construction code.

We have searched our files for tire contracts related to model year 1991 – 2000 Ranger, 1991 – 2000 Explorer, 1997 – 2000 Mountaineer, 1991 – 1996 Bronco, 1991 – 2000 F-Series, and 1997 – 2000 Expedition vehicles. In our search, we were unable to find all of the tire contracts for all of the subject vehicles and model years, and have requested the tire suppliers to provide copies in their files. The tire contracts will be provided with a request for confidentiality under separate cover as Appendix IV to NHTSA's Office of the Chief Counsel, pursuant to 49 CFR Part 512.

Request No. 8

> Of the 90 incidents describe in the enclosed reports, 82 occurred in Texas, Florida, Arizona, southern California, or other portions of the sun belt. Please provide all assessments, evaluations, and other analyses, including considerations by Ford, whether in draft or final form, whether complete or incomplete, and whether based on assumptions or facts, as to why most of the alleged incidents involve vehicle operated in warm weather or in warm climates. Provide any and all documents that relate or potentially relate to this issue or to any other geographical factors associated with the alleged defect.

Answer

Ford is construing this request broadly and providing not only assessments, evaluations, and other analyses related to the alleged defect, but also notes, correspondence, and other communications that were located pursuant to a diligent search for the requested information. The Ford business units and/or affiliates which were searched for responsive documents are as follows: Asia Pacific Operations and Associations, Business and Product Strategy, Corporate Finance, Environmental and Safety Engineering, Ford Automotive Operations, Ford Customer Service Division, Ford Division, Ford of Australia, Ford of Venezuela, Large and Luxury Vehicle Center, Manufacturing Executive Office, Marketing Operations, Marketing and Office of the General Counsel, Public Affairs, Product Development Staff, Process Leadership, Purchasing, Powertrain Operations, Quality, Research and Vehicle Technology, Small and Medium Vehicle Center, Truck Vehicle Center, and Visteon.

Appendix V-A includes such documents that are available at this time that relate or may be related to the effect of warm weather or warm climates on the alleged defect, or any other geographical factors associated with the alleged defect. Additional documents not gathered in time for this response will be provided by September 8, 2000.

Ford will be submitting additional information with a request for confidentiality under separate cover as Appendix V-B to the NHTSA's Office of the Chief Counsel pursuant to 49 CFR Part 512.

Ford is also in the process of determining the content of certain documents that are in foreign languages, and determining if any of the content is privileged or confidential. Ford will produce those documents that are relevant and not privileged as soon as practicable.

Ford has not attempted to obtain backup data to any documents created as a result of Computer Aided Engineering as such documentation would be duplicative.

Further, Ford is withholding documents responsive to this request that contain information protected by the attorney-client privilege and/or work-product doctrine, and it has redacted documents responsive to this request that contain information protected by the attorney-client privilege and/or work-product doctrine. Such documents will be described in a privilege log that Ford will provide by September 15, 2000.

Request No. 9

State whether Ford provided tire specifications to be used in the manufacture of tires for the subject vehicles. If so, for each such specification:

a. state the date on which it was provided by Ford;
b. identify the tire manufacturer to which it was provided; and
c. state the date or approximate date (so identified) on which it was provided.

Answer

Ford provides all tire suppliers for all light truck programs with two engineering specifications: ES-E0TA-1508 Specification – Tire Rolling Resistance Control [issued in 1982] and ES-E8TA-1508-AA Specification – Casing Tire Truck Type, Pass. Type (All Lt. Truck) [issued in 1989]. In September, 1998, ES-E8TA-1508-AA was superseded by ES-XU5A-1508-AA. This new engineering specification was provided to all tire suppliers at this time. These specifications can be found in Appendix VI.

Request No. 10

Respond to the following questions regarding tire inflation pressure:

a. For each of the subject vehicles, state, by model and model year, the recommended cold inflation pressure that Ford specifies for each tire size listed on the tire information placard affixed to the vehicle in accordance with Federal Motor Vehicle Safety standard No. 110, Tire Selection and Rims, or 120, Tire Selection and Rims for Motor Vehicles other than Passenger Cars, whichever is applicable.

b. State whether the recommended cold inflation pressure is specified on any other labels or materials affixed to, or furnished with, any of the subject vehicles, including, but not limited to the owner's manual. If the answer is yes, specify, for each such vehicle, the location of the labels or other materials in which the cold inflation pressure is specified. State whether the cold inflation pressure specified in those labels or other materials for all tire size is consistent with the cold inflation pressure specified for the same tire size on the tire information placard affixed to the vehicle in accordance with Standard Nos. 110 or 120. If not, identify all such differences and explain why those differences exist.

Answer

A summary of the latest recommended cold inflation pressure for a particular model year that Ford specified for each tire size that is listed on the tire information placard affixed to the vehicle for model year 1991 – 2000 Ranger, 1991 – 2000 Explorer, 1997 – 2000 Mountaineer, 1991 – 1996 Bronco, 1991 – 2000 F-Series, and 1997 – 2000 Expedition vehicles by model and model year can be found in Appendix VII-A. This list contains all tires that were authorized by engineering to be used on specific model years and models, but it is possible that not every tire was used in production. Note that due to the scope of your request and the requirement that information be provided on an expedited basis, we are unable to provide information regarding changes of the recommended cold inflation pressure of each tire during a particular model year at this time, but this information can be provided at a later date, upon request. However, it is exceedingly rare that the recommended inflation rate of a specific tire on a particular make and model of a vehicle would change during the course of a model year.

With two exceptions, the recommended cold inflation pressure is not specified on any other labels or materials affixed to, or furnished with model year 1991 – 2000 Ranger, 1991 – 2000 Explorer, 1997 – 2000 Mountaineer, 1991 – 1996 Bronco, 1991 – 2000 F-Series, and 1997 – 2000 Expedition vehicles, including, but not limited to the owner's manual. However, it is noted that in September, 1999, a separate hang tag was used on 2000 model year Explorers and Mountaineers to alert predelivery personnel and the owner of the proper recommended tire pressure to alleviate harsh ride complaints caused by improper tire pressure. This tag was placed on the rear view mirror, cigarette lighter knob, or the glove box. The tire pressure listed on the tag is consistent with the cold inflation pressure specified for the same tire size on the tire information placard affixed to the vehicle. A copy of this tag can be found in Appendix VII-B. This tag was discontinued at Louisville Assembly plant in February 2000, but it is still in use today for vehicles built at the St. Louis Assembly plant.

A review of all owner's manuals and other information provided with model year 1991 – 2000 Ranger, 1991 – 2000 Explorer, 1997 – 2000 Mountaineer, 1991 – 1996 Bronco, 1991 – 2000 F-Series, and 1997 – 2000 Expedition vehicles indicates that the owner's manual for the Electric Ranger lists the recommended inflation pressure. A copy of the specific page can be found in Appendix VII-C. The tire pressure listed is consistent with the cold inflation pressure specified on the tire information placard affixed to the vehicle.

Request No. 11

> State whether the VIN's assigned to any of the subject vehicles can be used to identify which tires were installed as original equipment. If so, explain how this information can be deciphered from the VIN.

Answer

In Ford's June 23, 2000 response to this request we stated that 1995 through 1997 model year Explorer and 1997 model year Mountaineer vehicles produced at the Louisville Assembly Plant were all equipped with Goodyear tires. We have since learned that only those vehicles produced with P235/75 R15 tires were manufactured using Goodyear tires (1997 Mountaineer were equipped with only the P235/75 R15 size tire). The following are additional subject vehicles produced at the Louisville Assembly Plant during this period.

Volume	Model	Tire Size	Tire Type
29,182	1995 Explorer	P255/70 R16	Wilderness AT
31,827	1996 Explorer	P255/70 R16	Wilderness AT
21,682	1997 Explorer	P225/70 R15	Wilderness HT
36,811	1997 Explorer	P255/70 R15	Wilderness AT

Request No. 12

State whether any of the subject vehicles were equipped with a spare tire. If so, provide the following information for each model subject vehicle that was so equipped:

a. State whether all vehicles within the model were equipped with a full size spare tire when first sold for purposes other than resale. If all vehicles were not so equipped, please identify those that were not so equipped and explain why.

b. If a full size spare tire was provided, state whether it would always be the same tire model as the other tires installed on the vehicle. If not, please explain all circumstances in which a different model spare tire was provided, identifying the model name and manufacturer of the spare tire and the model name and manufacturer of the other tires installed on the vehicle.

Answer

A summary of the spare tires equipped on model year 1991 – 2000 Ranger, 1991 – 2000 Explorer, 1997 – 2000 Mountaineer, 1991 – 1996 Bronco, 1991 – 2000 F-Series, and 1997 – 2000 Expedition vehicles by model and model year is provided in Appendix VIII. In the case where a vehicle utilizes a limited service (temporary) spare, it is possible that the spare tire may be a different manufacturer than the road tires equipped on the vehicle.

Some vehicle programs may not elect to use a full size spare. Vehicles that are not equipped with a full size spare are noted in the summary. We are unable to provide specific information regarding why certain vehicle programs elected to not use full size spares. Generally, these decisions are based on individual program needs relating to cost, weight and underbody packaging constraints. In a few instances, spare tires may not be equipped for the vehicle, as noted in the summary.

Request No. 13

Identify the five largest fleet purchasers of subject vehicles in each of the following states:

a. Texas
b. Arizona
c. Florida
d. Virginia
e. Ohio

If there are not five fleet purchasers for each state, please so indicate. State the approximate number of vehicles sold to each fleet by model and model year, the fleet name, fleet address, contact person, and phone number.

Answer

Ford has searched its vehicle sales records by purchaser name to identify those purchasers who have purchased the largest number of the subject vehicles. With the exception of the 1991-1994 Navajo and the 1994-2000 Mazda B series for which our records do not contain the identity of the purchaser because they were not sold by Ford but by Mazda, all subject vehicles were included in the search criteria.

Appendix IX, which will be provided to the NHTSA's Office of the Chief Counsel with a request for confidentially under separate cover, contains a list of the top 20 purchasers of subject vehicles for each of the specified states. We identified more fleet purchasers than requested because we have noted in the data that a single purchaser can be referred to by more than one abbreviation or variation of the name, e.g. XXXX INTL and XXXX INTERNATL. We have left to the Agency's discretion the combining of the data for those name variations that are likely to be the same entity. Model, model year and count data are provided for each vehicle purchased. Fleet address and phone number have been provided to the extent available in our records. The identity of a fleet contact person is not part of our vehicle records and is, therefore, not provided. On request of the Agency, Ford will provide the name of a business contact for any listed fleet with which we currently do business or are aware of an appropriate contact.

Request No. 14

> Identify the five largest fleet purchasers of subject vehicles manufactured between 1995 and 1997. State the approximate number of vehicles sold to each fleet, the fleet name, fleet address, contact person, and phone number.

Answer

Ford has searched its vehicle sales records by purchaser name to identify those purchasers who have purchased the largest number of the subject vehicles manufactured between January 1, 1995 and December 31, 1997. With the exception of the 1991-1994 Navajo and the 1994-2000 Mazda B-series for which our records do not contain the identity of the purchaser because they were not sold by Ford but by Mazda, all subject vehicles were included in the search criteria.

Appendix X, which will be provided to NHTSA's Office of the Chief Counsel with a request for confidentially under separate cover, contains a list of the top 20 purchasers of subject vehicles during the period specified. We identified more fleet purchasers than requested because we have noted in the data that a single purchaser can be referred to by more than one abbreviation or variation of the name, e.g. XXXX MANAGEMENT SERVI and XXXX VEHICLE MAN. We have left to the Agency's discretion the combining of the data for those name variations that are likely to be the same entity. Model, model year and count data is provided for each vehicle purchased. Fleet address and phone number have been provided to the extent available in our records. The identity of a fleet contact person is not part of our vehicle records and is therefore not provided. On request of the Agency, Ford will provide the name of a business contact for any listed fleet with which we currently do business or are aware of an appropriate contact.

Request No. 15

> With regard to the alleged defect, state what Ford believes to be:
> a. the factors which may cause or contribute to a tire tread separation;
> b. the factors which may cause or contribute to a tire blowout;
> c. the risk to motor vehicle safety resulting from tire tread separation; and
> c. the risk to motor vehicle safety resulting from a tire blowout.

Answer

Generally, tire tread separations are caused by over deflection and/or excessive heat cycling of the tire body. In addition, a weakness in the tire's manufacturing process may also cause the tire to be more susceptible to tread separation. Over deflection of the tire, over a period of time, will eventually cause fatigue failure of the tire's structure while excessive heat cycling contributes to the failure mechanism by causing the rubber to heat age, thus reducing the tear resistance of the rubber. The effects of fatigue and heat aging will eventually cause the bond between the rubber of the tread and the rubber between the steel belts to weaken. When the rubber to steel belt bond weakens/fails, tread separation can occur.

Significant factors that can cause increased heat cycling are high ambient temperatures and prolonged high speed operation. Over deflection is another factor that causes elevated tire temperatures and increases the heat cycling process. Two significant causes of tire over deflection are vehicle operation at low tire inflation pressures and vehicle/tire overloading. Tire with more mileage have had more opportunity for exposure to these factors.

In general, tire blow outs are most likely to occur due to one of two conditions. Road hazards of various kinds can cause punctures of the tire cavity, damage to the wheel rim and the ability of the wheel/tire assembly to retain air, or damage to the tire's sidewall that eventually leads to tire structural failure. Over deflection and/or excessive heat cycling, discussed above, can also cause fatigue failure of the tire sidewall/carcass which subsequently can lead to a tire blow out.

As the Agency is aware, Ford does not manufacture tires and therefore is not in the position to comment on specific tire design or construction conditions, specific to the subject tires, that would be likely to cause tread separation or tire blow out. Ford believes that Bridgestone/Firestone, the designer, manufacturer, and supplier of the subject tires could provide a more comprehensive explanation than Ford.

Both tread separation and tire blow outs can and have occurred on nearly all types and brands of tires. Ford believes that the risk to motor vehicle safety of a tire blowout or tread separation depends largely on the driver's reaction to the event. Typically there will be a noise or vibration that precedes the event, and can serve as a warning to have the tire inspected or replaced. Whether or not there is a warning, a vehicle does not inherently go "out of control" when the event occurs, but will continue to respond to driver control actions. If the driver does not put excessive steering or braking into the vehicle, but decelerates slowly, the likelihood of a vehicle crash is relatively small. If, however, the driver does make excessive control actions, then the outcome depends in large part on those actions. If the vehicle goes off the road surface, the likelihood of a crash or rollover is relatively higher.

Request No. 16

> Provide information about Ford's record keeping methods for tracking consumer complaints for the past 10 years. Include the following information:

a. Describe how a consumer would transmit a complaint that would or could be received by Ford regarding a tire problem such as the alleged defect in a subject tire.

b. state whether Ford dealers collect and record information on tire complaints. If so, identify all such information that Ford dealers collect and record.

c. If a tire is not covered under warranty or if a tire was out of warranty at the time Ford was contacted, state whether a record of the complaint would be retained in Ford's files. If so, state how the record would be retained. If not, please explain why.

d. If a complainant contacted Ford concerning the alleged defect in a subject tire, state whether a record would be generated and stored. If so, state where and in what format the record would be generated, the information the record would contain, and for what period of time the record would be stored. If a record is not generated every time a complaint is filed, please explain in detail the reasons why.

e. When Ford receives a complaint concerning a tire, state whether it records information regarding the tire. If so, identify the information that Ford records. State whether the information that Ford records includes the tire's model name, manufacturer, size, and DOT identification number.

f. State whether it is Ford's practice to inform vehicle owners with tire problems to contact the tire manufacturer. If so, state the reasons that Ford adopted this practice and the length of time it has been if effect. Produce copies of all guidance that Ford has issued to vehicle owners, fleet operators, vehicle dealers, field offices or other Ford locations with regard to the handling of tire complaints.

g. State whether Ford transmits the complaints it receives regarding Firestone Tires to Bridgestone/Firestone, Inc., including any division or subsidiary of that company. If so, identify the name and address of the offices in Bridgestone/Firestone, Inc., or in any of its divisions or subsidiaries, to which Ford transmits these complaints.

Answer

In Ford's June 23, 2000 response to the Agency, specifically to subsection f, Ford stated that it would determine which documents, if any, pertained to the handling of tire complaints. Ford is still in the process of investigating whether there are responsive documents to this request and, if so, they will be provided as soon as practicable.

Request No. 17

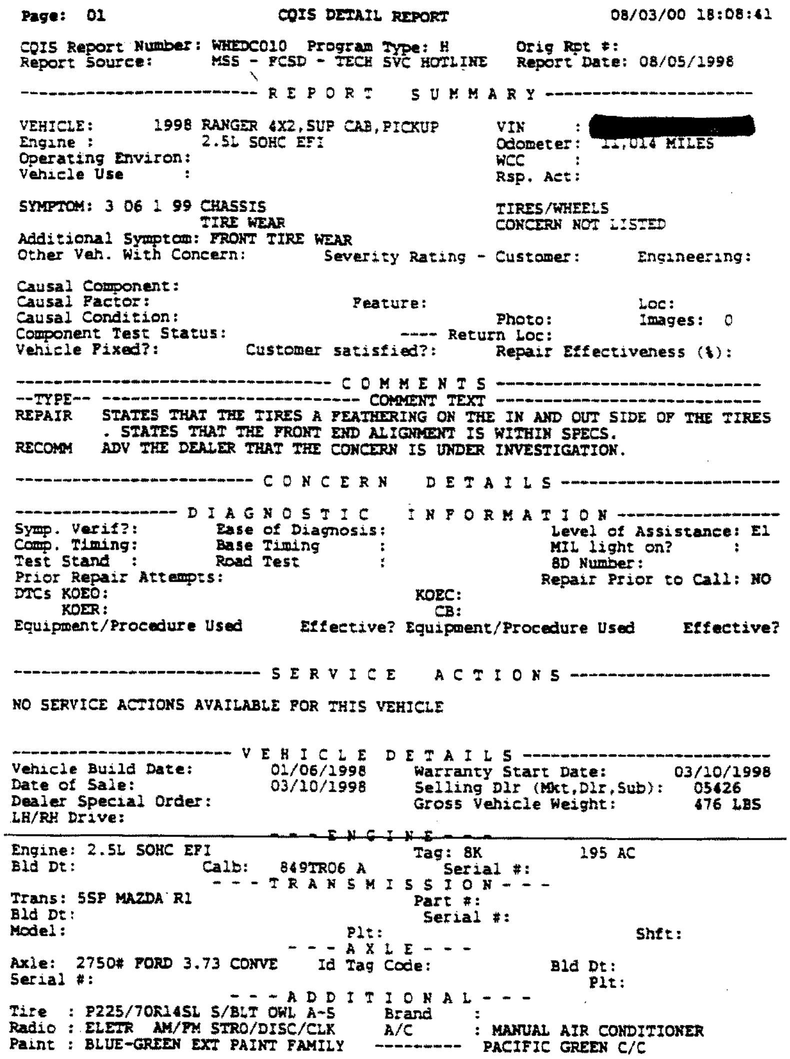
State the date that Ford ceased collecting information for use in responding to each item in this Information Request. If more than one date applies, please provide the date for each information type (e.g., vehicle population, owner complaints, warranty, etc.)

Answer

Ford, when requesting CQIS, MORS and Fleet Test data, requested that it be dated through May 10, 2000 (the date of the inquiry). Ford also collected documents from individuals dated through May 10, 2000. Ford's search for lawsuits and claims usually also mirror other incident data searches. In this instance the lawsuit and claims were dated through May 10, 2000. However, additional lawsuits (e.g. Complaints and discovery pleadings, if any), and first notices (MORS III) that have been received as recently as during the during the last two of weeks are attached in Appendix XI. The search of consumer breach of warranty lawsuits was performed on July 25,2000 and the last service date from that search is June 23, 2000.

Lastly, Ford has determined that 1991 model year Bronco vehicles were inadvertently omitted from the searches it performed for MORS, CQIS and Fleet Test data, and lawsuits and claims. Ford is now searching for responsive information and will be provide it as soon as practicable.

###



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Page:  01                    CQIS DETAIL REPORT               08/03/00 18:08:41

CQIS Report Number: WHEDC010  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 08/05/1998

------------------------ R E P O R T   S U M M A R Y ----------------------

VEHICLE:       1998 RANGER 4X2,SUP CAB,PICKUP       VIN      : [redacted]
Engine :            2.5L SOHC EFI                   Odometer:  11,014 MILES
Operating Environ:                                  WCC      :
Vehicle Use      :                                  Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                          TIRES/WHEELS
                   TIRE WEAR                        CONCERN NOT LISTED
Additional Symptom: FRONT TIRE WEAR
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                         Feature:                  Loc:
Causal Condition:                                   Photo:       Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:          Customer satisfied?:       Repair Effectiveness (%):

------------------------------- C O M M E N T S ---------------------------
--TYPE-- ------------------------- COMMENT TEXT ---------------------------
REPAIR   STATES THAT THE TIRES A FEATHERING ON THE IN AND OUT SIDE OF THE TIRES
         . STATES THAT THE FRONT END ALIGNMENT IS WITHIN SPECS.
RECOMM   ADV THE DEALER THAT THE CONCERN IS UNDER INVESTIGATION.

------------------------ C O N C E R N   D E T A I L S ----------------------

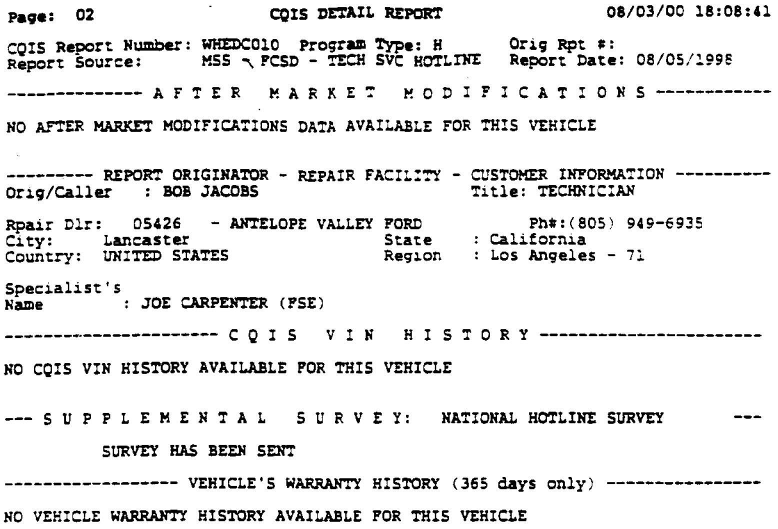
---------------- D I A G N O S T I C   I N F O R M A T I O N ----------------
Symp. Verif?:        Ease of Diagnosis:                Level of Assistance: E1
Comp. Timing:        Base Timing      :                MIL light on?      :
Test Stand   :       Road Test        :                8D Number:
Prior Repair Attempts:                                Repair Prior to Call: NO
DTCs KOEO:                                 KOEC:
     KOER:                                   CB:
Equipment/Procedure Used       Effective? Equipment/Procedure Used     Effective?

------------------------- S E R V I C E   A C T I O N S --------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE


---------------------- V E H I C L E   D E T A I L S ------------------------
Vehicle Build Date:          01/06/1998     Warranty Start Date:       03/10/1998
Date of Sale:                03/10/1998     Selling Dlr (Mkt,Dlr,Sub):   05426
Dealer Special Order:                       Gross Vehicle Weight:        476 LBS
LH/RH Drive:
                          - - - E N G I N E - - -
Engine: 2.5L SOHC EFI                      Tag: 8K          195 AC
Bld Dt:              Calb:   849TR06 A        Serial #:
                     - - - T R A N S M I S S I O N - - -
Trans: 5SP MAZDA R1                        Part #:
Bld Dt:                                     Serial #:
Model:                           Plt:                                 Shft:
                            - - - A X L E - - -
Axle:  2750# FORD 3.73 CONVE     Id Tag Code:             Bld Dt:
Serial #:                                                     Plt:
                      - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S    Brand     :
Radio : ELETR  AM/FM STRO/DISC/CLK    A/C       : MANUAL AIR CONDITIONER
Paint : BLUE-GREEN EXT PAINT FAMILY   ---------  PACIFIC GREEN C/C
```

REDACTED



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Page:  02                 CQIS DETAIL REPORT                08/03/00 18:08:41

CQIS Report Number: WHEDC010  Program Type: H        Orig Rpt #:
Report Source:       MSS - FCSD - TECH SVC HOTLINE   Report Date: 08/05/1998

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : BOB JACOBS                        Title: TECHNICIAN

Rpair Dlr:   05426   - ANTELOPE VALLEY FORD             Ph#:(805) 949-6935
City:      Lancaster                     State     : California
Country:  UNITED STATES                  Region    : Los Angeles - 71

Specialist's
Name         : JOE CARPENTER (FSE)
----------------------- C Q I S   V I N   H I S T O R Y -----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY        ---

          SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) -----------------

NO VEHICLE WARRANTY HISTORY AVAILABLE FOR THIS VEHICLE
```

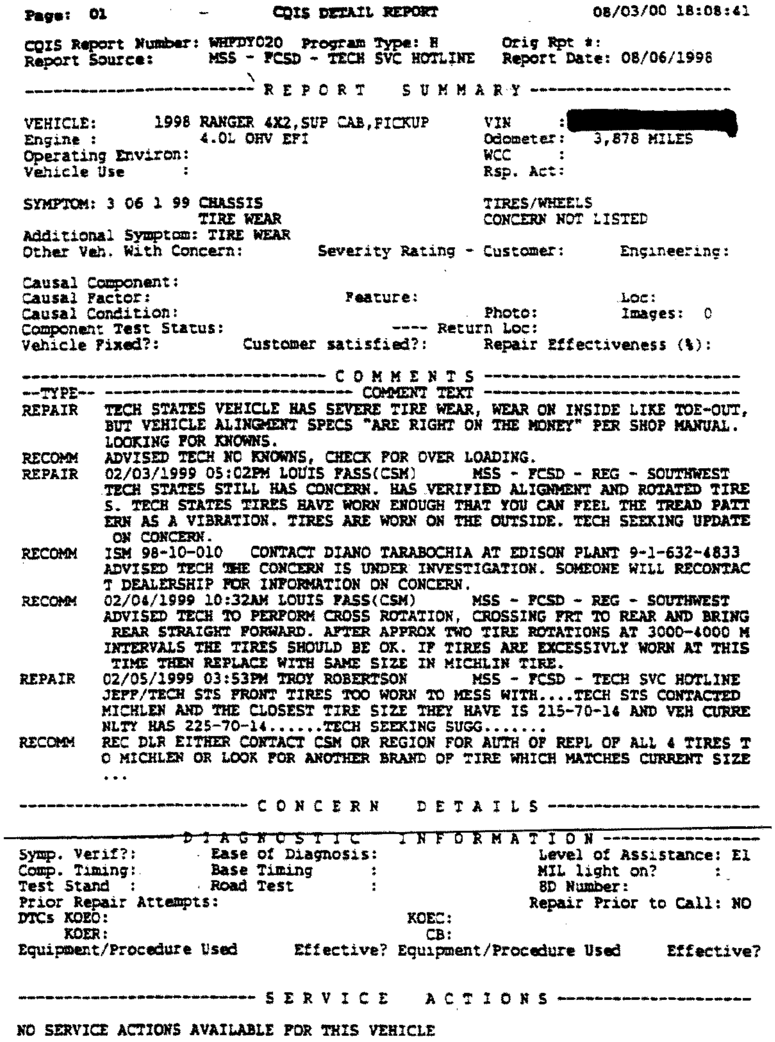

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Page: 01          -        CQIS DETAIL REPORT                08/03/00 18:08:41

CQIS Report Number: WHPDY020  Program Type: H        Orig Rpt #:
Report Source:       MSS - FCSD - TECH SVC HOTLINE   Report Date: 08/06/1998

-------------------------- R E P O R T   S U M M A R Y -----------------------

VEHICLE:        1998 RANGER 4X2,SUP CAB,PICKUP       VIN      :[redacted]
Engine :             4.0L OHV EFI                    Odometer:   3,878 MILES
Operating Environ:                                   WCC      :
Vehicle Use      :                                   Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                           TIRES/WHEELS
                   TIRE WEAR                         CONCERN NOT LISTED
Additional Symptom: TIRE WEAR
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                        Feature:                     Loc:
Causal Condition:                                    Photo:        Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:        Customer satisfied?:        Repair Effectiveness (%):

-------------------------------- C O M M E N T S -----------------------------
--TYPE-- ---------------------------- COMMENT TEXT ----------------------------
REPAIR   TECH STATES VEHICLE HAS SEVERE TIRE WEAR, WEAR ON INSIDE LIKE TOE-OUT,
         BUT VEHICLE ALINGMENT SPECS "ARE RIGHT ON THE MONEY" PER SHOP MANUAL.
         LOOKING FOR KNOWNS.
RECOMM   ADVISED TECH NO KNOWNS, CHECK FOR OVER LOADING.
REPAIR   02/03/1999 05:02PM LOUIS FASS(CSM)        MSS - FCSD - REG - SOUTHWEST
         TECH STATES STILL HAS CONCERN. HAS VERIFIED ALIGNMENT AND ROTATED TIRE
         S. TECH STATES TIRES HAVE WORN ENOUGH THAT YOU CAN FEEL THE TREAD PATT
         ERN AS A VIBRATION. TIRES ARE WORN ON THE OUTSIDE. TECH SEEKING UPDATE
          ON CONCERN.
RECOMM   ISM 98-10-010   CONTACT DIANO TARABOCHIA AT EDISON PLANT 9-1-632-4833
         ADVISED TECH THE CONCERN IS UNDER INVESTIGATION. SOMEONE WILL RECONTAC
         T DEALERSHIP FOR INFORMATION ON CONCERN.
RECOMM   02/04/1999 10:32AM LOUIS FASS(CSM)        MSS - FCSD - REG - SOUTHWEST
         ADVISED TECH TO PERFORM CROSS ROTATION, CROSSING FRT TO REAR AND BRING
          REAR STRAIGHT FORWARD. AFTER APPROX TWO TIRE ROTATIONS AT 3000-4000 M
         INTERVALS THE TIRES SHOULD BE OK. IF TIRES ARE EXCESSIVLY WORN AT THIS
          TIME THEN REPLACE WITH SAME SIZE IN MICHLIN TIRE.
REPAIR   02/05/1999 03:53PM TROY ROBERTSON         MSS - FCSD - TECH SVC HOTLINE
         JEFF/TECH STS FRONT TIRES TOO WORN TO MESS WITH....TECH STS CONTACTED
         MICHLEN AND THE CLOSEST TIRE SIZE THEY HAVE IS 215-70-14 AND VEH CURRE
         NLTY HAS 225-70-14......TECH SEEKING SUGG.......
RECOMM   REC DLR EITHER CONTACT CSM OR REGION FOR AUTH OF REPL OF ALL 4 TIRES T
         O MICHLEN OR LOOK FOR ANOTHER BRAND OF TIRE WHICH MATCHES CURRENT SIZE
         ...

-------------------------- C O N C E R N   D E T A I L S ----------------------
----------------------- D I A G N O S T I C   I N F O R M A T I O N -----------
Symp. Verif?:        Ease of Diagnosis:                  Level of Assistance: E1
Comp. Timing:        Base Timing       :                 MIL light on?       :
Test Stand   :       Road Test         :                 8D Number:
Prior Repair Attempts:                                   Repair Prior to Call: NO
DTCs KOEO:                                  KOEC:
     KOER:                                    CB:
Equipment/Procedure Used       Effective? Equipment/Procedure Used      Effective?

---------------------------- S E R V I C E   A C T I O N S --------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE
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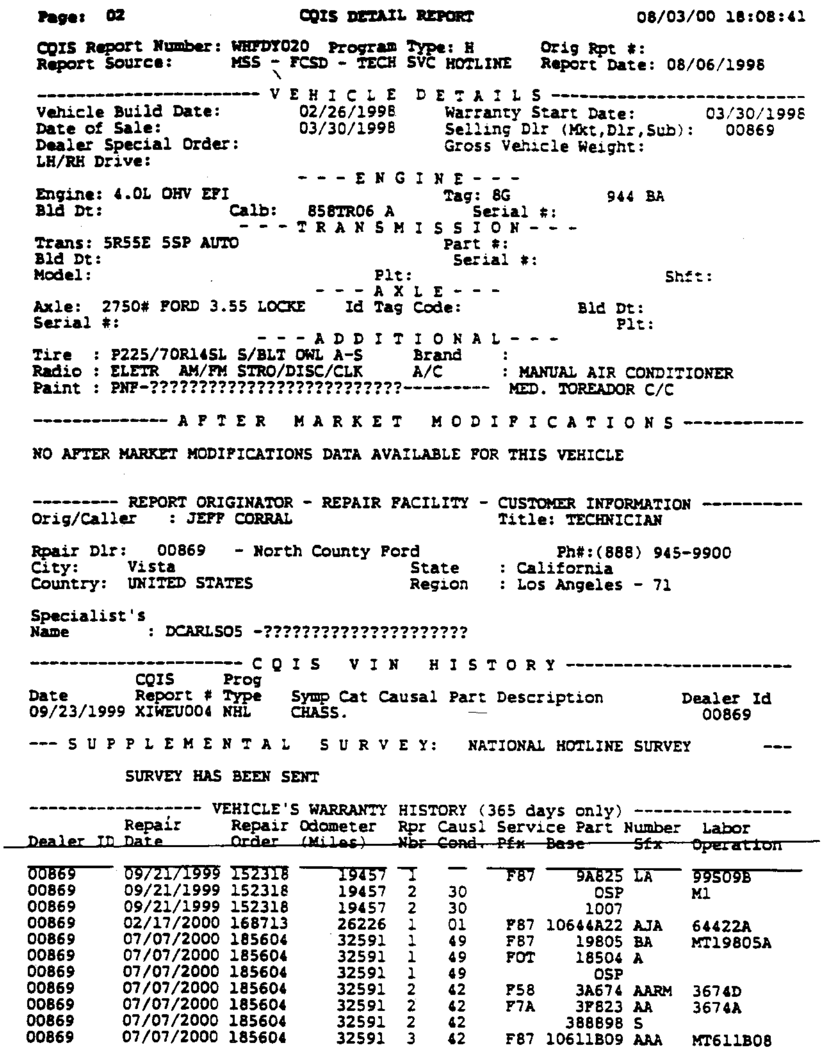

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Page: 02                   CQIS DETAIL REPORT                  08/03/00 18:08:41

CQIS Report Number: WHFDY020  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 08/06/1998
                       \
----------------------- V E H I C L E  D E T A I L S -------------------------
Vehicle Build Date:         02/26/1998    Warranty Start Date:        03/30/1998
Date of Sale:               03/30/1998    Selling Dlr (Mkt,Dlr,Sub):   00869
Dealer Special Order:                     Gross Vehicle Weight:
LH/RH Drive:
                              - - - E N G I N E - - -
Engine: 4.0L OHV EFI                      Tag: 8G          944 BA
Bld Dt:              Calb:   858TR06 A        Serial #:
                          - - - T R A N S M I S S I O N - - -
Trans: 5R55E 5SP AUTO                     Part #:
Bld Dt:                                    Serial #:
Model:                          Plt:                                 Shft:
                                 - - - A X L E - - -
Axle:  2750# FORD 3.55 LOCKE    Id Tag Code:              Bld Dt:
Serial #:                                                     Plt:
                            - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S     Brand     :
Radio : ELETR  AM/FM STRO/DISC/CLK     A/C       : MANUAL AIR CONDITIONER
Paint : PNF-?????????????????????????---------  MED. TOREADOR C/C

-------------- A F T E R  M A R K E T  M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : JEFF CORRAL                        Title: TECHNICIAN

Rpair Dlr:   00869    - North County Ford                Ph#:(888) 945-9900
City:      Vista                             State    : California
Country:  UNITED STATES                      Region   : Los Angeles - 71

Specialist's
Name          : DCARLSO5 -?????????????????????

---------------------- C Q I S   V I N   H I S T O R Y -----------------------
            CQIS      Prog
Date        Report # Type    Symp Cat Causal Part Description         Dealer Id
09/23/1999 XIWEU004 NHL     CHASS.              —                      00869

--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY       ---

           SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) -----------------
            Repair      Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID Date         Order  (Miles)   Nbr Cond. Pfx  Base      Sfx   Operation

00869      09/21/1999 152318      19457  1           F87     9A825 LA    99509B
00869      09/21/1999 152318      19457  2    30               OSP       M1
00869      09/21/1999 152318      19457  2    30              1007
00869      02/17/2000 168713      26226  1    01     F87 10644A22 AJA    64422A
00869      07/07/2000 185604      32591  1    49     F87     19805 BA    MT19805A
00869      07/07/2000 185604      32591  1    49     FOT     18504 A
00869      07/07/2000 185604      32591  1    49               OSP
00869      07/07/2000 185604      32591  2    42     F58     3A674 AARM  3674D
00869      07/07/2000 185604      32591  2    42     F7A     3F823 AA    3674A
00869      07/07/2000 185604      32591  2    42            388898 S
00869      07/07/2000 185604      32591  3    42     F87 10611B09 AAA    MT611B08
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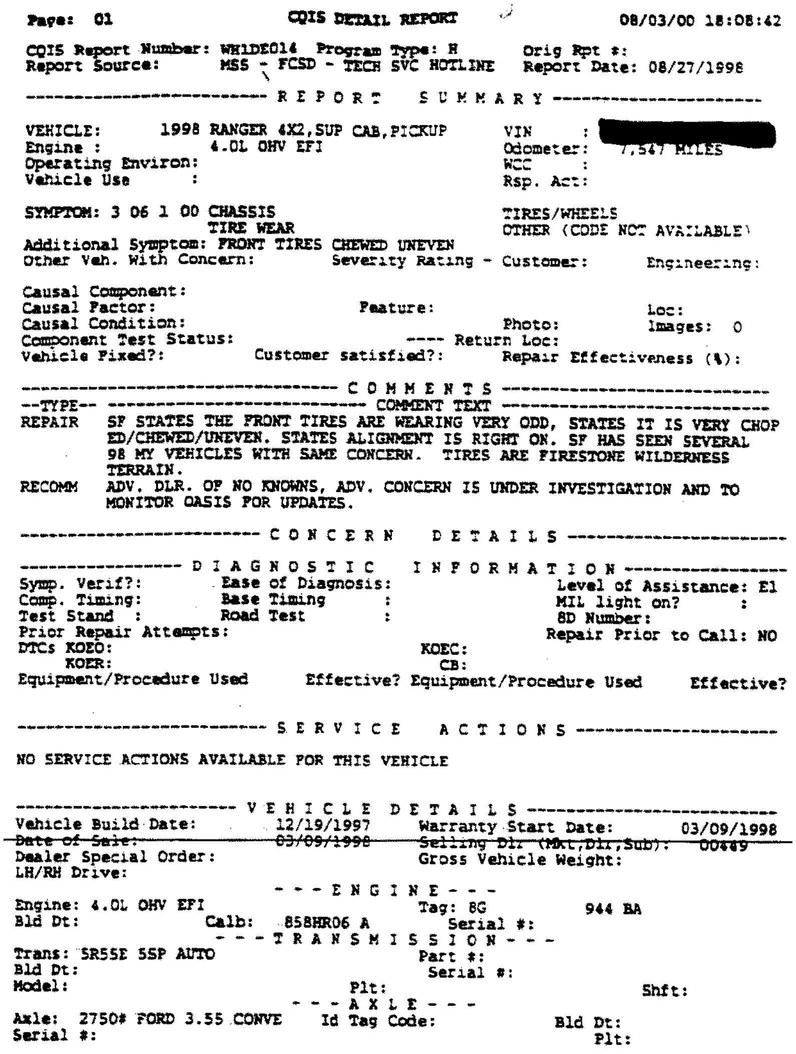

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Page: 01                    CQIS DETAIL REPORT                 08/03/00 18:08:42

CQIS Report Number: WH1DE014  Program Type: H         Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 08/27/1998

------------------------- R E P O R T   S U M M A R Y --------------------

VEHICLE:        1998 RANGER 4X2,SUP CAB,PICKUP        VIN      : [redacted]
Engine :             4.0L OHV EFI                     Odometer:   7,547 MILES
Operating Environ:                                    WCC      :
Vehicle Use       :                                   Rsp. Act:

SYMPTOM: 3 06 1 00 CHASSIS                            TIRES/WHEELS
                   TIRE WEAR                          OTHER (CODE NOT AVAILABLE)
Additional Symptom: FRONT TIRES CHEWED UNEVEN
Other Veh. With Concern:        Severity Rating - Customer:     Engineering:

Causal Component:
Causal Factor:                        Feature:                       Loc:
Causal Condition:                                     Photo:         Images:  0
Component Test Status:                      ---- Return Loc:
Vehicle Fixed?:         Customer satisfied?:      Repair Effectiveness (%):

--------------------------------- C O M M E N T S ---------------------------
--TYPE-- -------------------------- COMMENT TEXT ----------------------------
REPAIR   SF STATES THE FRONT TIRES ARE WEARING VERY ODD, STATES IT IS VERY CHOP
         ED/CHEWED/UNEVEN. STATES ALIGNMENT IS RIGHT ON. SF HAS SEEN SEVERAL
         98 MY VEHICLES WITH SAME CONCERN.  TIRES ARE FIRESTONE WILDERNESS
         TERRAIN.
RECOMM   ADV. DLR. OF NO KNOWNS, ADV. CONCERN IS UNDER INVESTIGATION AND TO
         MONITOR OASIS FOR UPDATES.

------------------------- C O N C E R N   D E T A I L S ----------------------

----------------- D I A G N O S T I C   I N F O R M A T I O N -----------------
Symp. Verif?:        Ease of Diagnosis:                  Level of Assistance: E1
Comp. Timing:        Base Timing      :                  MIL light on?       :
Test Stand  :        Road Test        :                  8D Number:
Prior Repair Attempts:                                  Repair Prior to Call: NO
DTCs KOEO:                              KOEC:
     KOER:                                CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used      Effective?

-------------------------- S E R V I C E   A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

----------------------- V E H I C L E   D E T A I L S -------------------------
Vehicle Build Date:          12/19/1997    Warranty Start Date:        03/09/1998
~~Date of Sale:                03/09/1998    Selling Dlr (Mkt,Dlr,Sub):    00449~~
Dealer Special Order:                      Gross Vehicle Weight:
LH/RH Drive:
                             - - - E N G I N E - - -
Engine: 4.0L OHV EFI                       Tag: 8G          944 BA
Bld Dt:              Calb:  858HR06 A         Serial #:
                       - - - T R A N S M I S S I O N - - -
Trans: 5R55E 5SP AUTO                      Part #:
Bld Dt:                                     Serial #:
Model:                          Plt:                                 Shft:
                              - - - A X L E - - -
Axle:  2750# FORD 3.55 CONVE   Id Tag Code:               Bld Dt:
Serial #:                                                     Plt:
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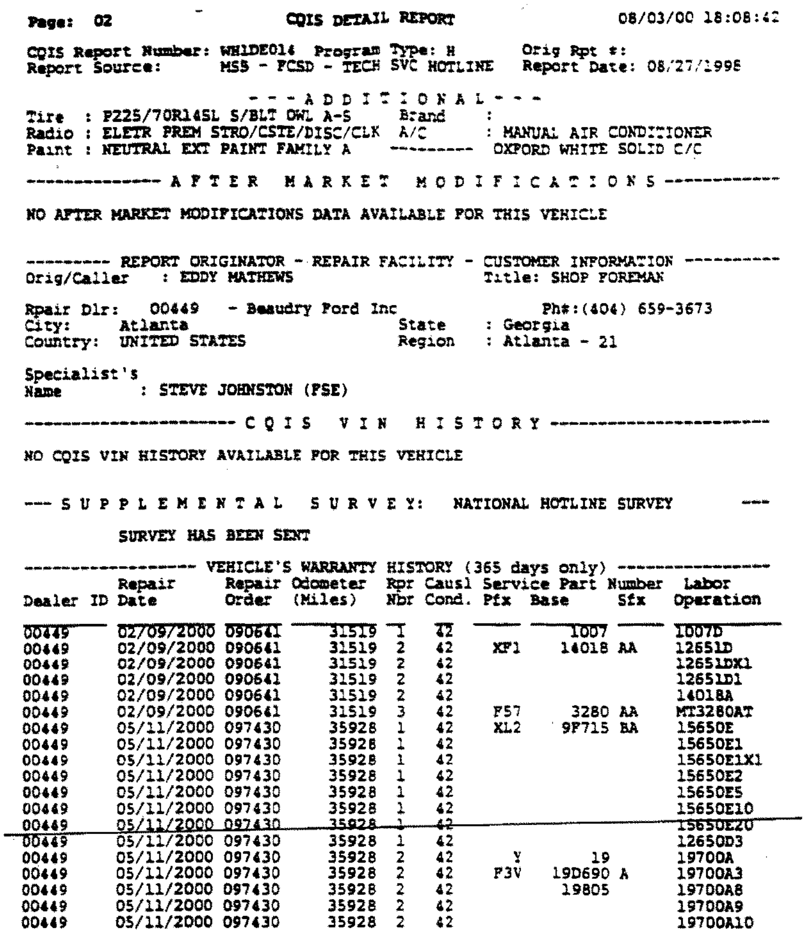

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Page:  02                   CQIS DETAIL REPORT                 08/03/00 18:08:42

CQIS Report Number: WH1DE014  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 08/27/1998

                         - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S     Brand    :
Radio : ELETR PREM STRO/CSTE/DISC/CLK  A/C      : MANUAL AIR CONDITIONER
Paint : NEUTRAL EXT PAINT FAMILY A     ---------  OXFORD WHITE SOLID C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S -----------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : EDDY MATHEWS                    Title: SHOP FOREMAN

Rpair Dlr:   00449   - Beaudry Ford Inc              Ph#:(404) 659-3673
City:     Atlanta                       State    : Georgia
Country:  UNITED STATES                 Region   : Atlanta - 21

Specialist's
Name        : STEVE JOHNSTON (FSE)
---------------------- C Q I S   V I N   H I S T O R Y ----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY      ---

        SURVEY HAS BEEN SENT

----------------- VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
          Repair      Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID Date        Order  (Miles)   Nbr Cond. Pfx  Base     Sfx   Operation

00449     02/09/2000 090641    31519   1    42         1007          1007D
00449     02/09/2000 090641    31519   2    42    XF1  14018 AA      12651D
00449     02/09/2000 090641    31519   2    42                       12651DX1
00449     02/09/2000 090641    31519   2    42                       12651D1
00449     02/09/2000 090641    31519   2    42                       14018A
00449     02/09/2000 090641    31519   3    42    F57   3280 AA      MT3280AT
00449     05/11/2000 097430    35928   1    42    XL2  9F715 BA      15650E
00449     05/11/2000 097430    35928   1    42                       15650E1
00449     05/11/2000 097430    35928   1    42                       15650E1X1
00449     05/11/2000 097430    35928   1    42                       15650E2
00449     05/11/2000 097430    35928   1    42                       15650E5
00449     05/11/2000 097430    35928   1    42                       15650E10
00449     05/11/2000 097430    35928   1    42                       15650E20
00449     05/11/2000 097430    35928   1    42                       12650D3
00449     05/11/2000 097430    35928   2    42      Y     19         19700A
00449     05/11/2000 097430    35928   2    42    F3V 19D690 A       19700A3
00449     05/11/2000 097430    35928   2    42         19805         19700A8
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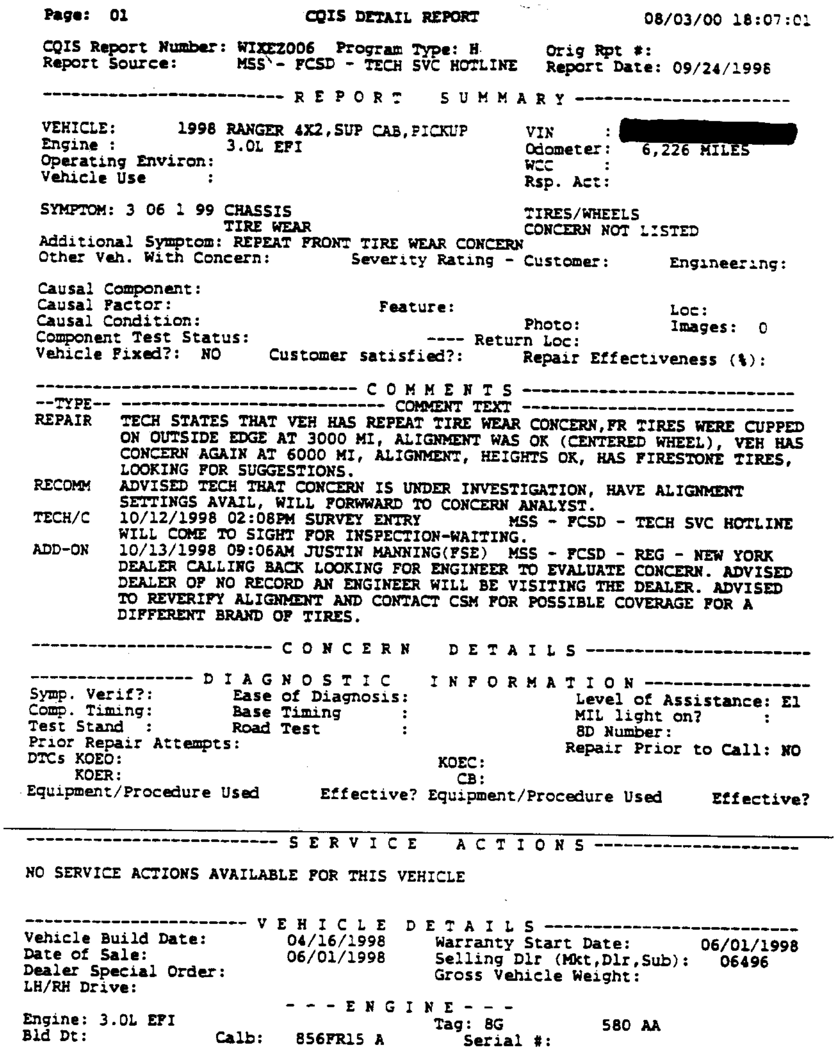

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Page: 01                       CQIS DETAIL REPORT                 08/03/00 18:07:01

CQIS Report Number: WIXEZ006  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 09/24/1998

----------------------- R E P O R T   S U M M A R Y --------------------

VEHICLE:        1998 RANGER 4X2,SUP CAB,PICKUP       VIN      : [redacted]
Engine :             3.0L EFI                        Odometer:   6,226 MILES
Operating Environ:                                   WCC      :
Vehicle Use      :                                   Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                           TIRES/WHEELS
                   TIRE WEAR                         CONCERN NOT LISTED
Additional Symptom: REPEAT FRONT TIRE WEAR CONCERN
Other Veh. With Concern:       Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                        Feature:                  Loc:
Causal Condition:                                    Photo:     Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:  NO    Customer satisfied?:      Repair Effectiveness (%):

------------------------------ C O M M E N T S --------------------------
--TYPE-- ------------------------- COMMENT TEXT --------------------------
REPAIR   TECH STATES THAT VEH HAS REPEAT TIRE WEAR CONCERN,FR TIRES WERE CUPPED
         ON OUTSIDE EDGE AT 3000 MI, ALIGNMENT WAS OK (CENTERED WHEEL), VEH HAS
         CONCERN AGAIN AT 6000 MI, ALIGNMENT, HEIGHTS OK, HAS FIRESTONE TIRES,
         LOOKING FOR SUGGESTIONS.
RECOMM   ADVISED TECH THAT CONCERN IS UNDER INVESTIGATION, HAVE ALIGNMENT
         SETTINGS AVAIL, WILL FORWWARD TO CONCERN ANALYST.
TECH/C   10/12/1998 02:08PM SURVEY ENTRY       MSS - FCSD - TECH SVC HOTLINE
         WILL COME TO SIGHT FOR INSPECTION-WAITING.
ADD-ON   10/13/1998 09:06AM JUSTIN MANNING(FSE)  MSS - FCSD - REG - NEW YORK
         DEALER CALLING BACK LOOKING FOR ENGINEER TO EVALUATE CONCERN. ADVISED
         DEALER OF NO RECORD AN ENGINEER WILL BE VISITING THE DEALER. ADVISED
         TO REVERIFY ALIGNMENT AND CONTACT CSM FOR POSSIBLE COVERAGE FOR A
         DIFFERENT BRAND OF TIRES.

----------------------- C O N C E R N   D E T A I L S ----------------------

--------------- D I A G N O S T I C   I N F O R M A T I O N ---------------
Symp. Verif?:       Ease of Diagnosis:              Level of Assistance: E1
Comp. Timing:       Base Timing       :             MIL light on?       :
Test Stand  :       Road Test         :             8D Number:
Prior Repair Attempts:                             Repair Prior to Call: NO
DTCs KOEO:                                 KOEC:
     KOER:                                   CB:
Equipment/Procedure Used     Effective? Equipment/Procedure Used     Effective?
______________________________________________________________________________
----------------------- S E R V I C E   A C T I O N S ----------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

----------------------- V E H I C L E   D E T A I L S ----------------------
Vehicle Build Date:        04/16/1998     Warranty Start Date:        06/01/1998
Date of Sale:              06/01/1998     Selling Dlr (Mkt,Dlr,Sub):   06496
Dealer Special Order:                     Gross Vehicle Weight:
LH/RH Drive:
                          - - - E N G I N E - - -
Engine: 3.0L EFI                          Tag: 8G          580 AA
Bld Dt:            Calb:    856FR15 A        Serial #:
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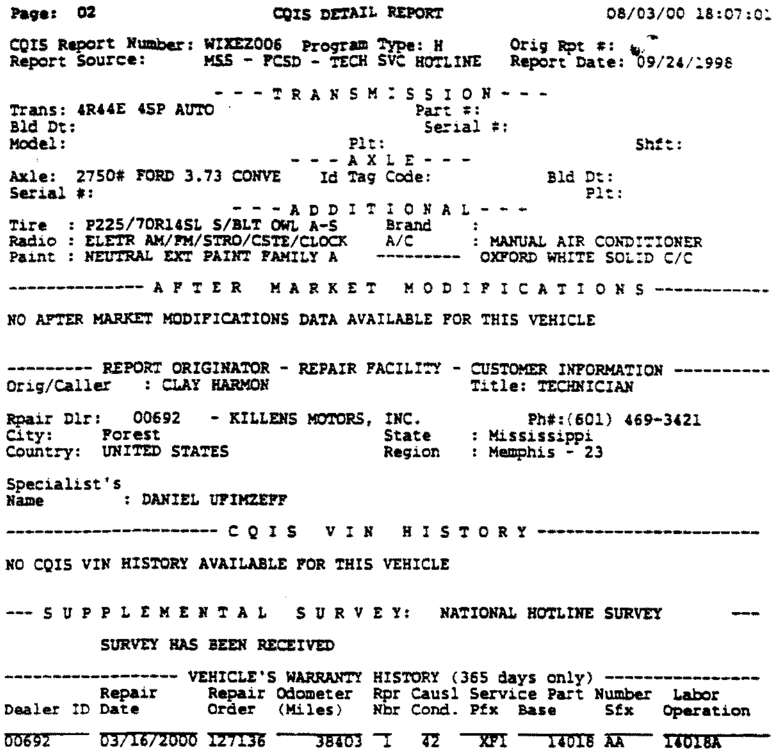

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Page:  02                   CQIS DETAIL REPORT                08/03/00 18:07:0

CQIS Report Number: WIXEZ006  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 09/24/1998

                      - - - T R A N S M I S S I O N - - -
Trans: 4R44E 4SP AUTO                      Part #:
Bld Dt:                                     Serial #:
Model:                          Plt:                             Shft:
                                 - - - A X L E - - -
Axle:  2750# FORD 3.73 CONVE    Id Tag Code:            Bld Dt:
Serial #:                                                   Plt:
                         - - - A D D I T I O N A L - - -
Tire   : P225/70R14SL S/BLT OWL A-S     Brand     :
Radio  : ELETR AM/FM/STRO/CSTE/CLOCK    A/C       : MANUAL AIR CONDITIONER
Paint  : NEUTRAL EXT PAINT FAMILY A    ---------  OXFORD WHITE SOLID C/C

--------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : CLAY HARMON                        Title: TECHNICIAN

Rpair Dlr:    00692    - KILLENS MOTORS, INC.           Ph#:(601) 469-3421
City:      Forest                        State     : Mississippi
Country:   UNITED STATES                 Region    : Memphis - 23

Specialist's
Name          : DANIEL UFIMZEFF
----------------------- C Q I S   V I N   H I S T O R Y -----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY        ---

         SURVEY HAS BEEN RECEIVED

------------------- VEHICLE'S WARRANTY HISTORY (365 days only) -----------------
           Repair       Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID  Date         Order  (Miles)   Nbr Cond. Pfx  Base     Sfx   Operation

00692      03/16/2000  127136     38403   I   42    XFI    14018 AA    14018A
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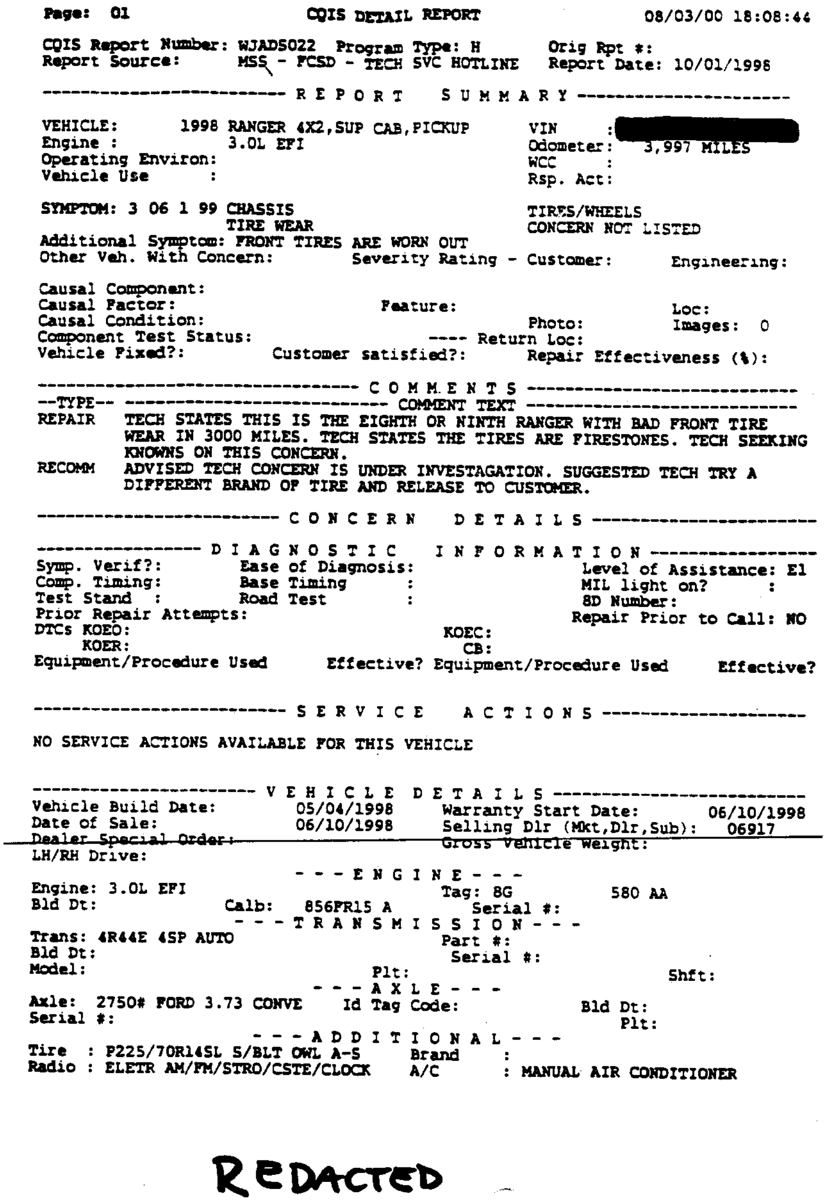

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Page:  01                      CQIS DETAIL REPORT                   08/03/00 18:08:44

CQIS Report Number: WJADS022  Program Type: H        Orig Rpt #:
Report Source:       MSS - FCSD - TECH SVC HOTLINE   Report Date: 10/01/1998

------------------------- R E P O R T    S U M M A R Y ---------------------

VEHICLE:        1998 RANGER 4X2,SUP CAB,PICKUP       VIN      :[redacted]
Engine :             3.0L EFI                        Odometer:   3,997 MILES
Operating Environ:                                   WCC      :
Vehicle Use      :                                   Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                           TIRES/WHEELS
                   TIRE WEAR                         CONCERN NOT LISTED
Additional Symptom: FRONT TIRES ARE WORN OUT
Other Veh. With Concern:        Severity Rating - Customer:       Engineering:

Causal Component:
Causal Factor:                         Feature:                    Loc:
Causal Condition:                                    Photo:        Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:         Customer satisfied?:         Repair Effectiveness (%):

--------------------------------- C O M M E N T S --------------------------
--TYPE-- --------------------------- COMMENT TEXT ---------------------------
REPAIR   TECH STATES THIS IS THE EIGHTH OR NINTH RANGER WITH BAD FRONT TIRE
         WEAR IN 3000 MILES. TECH STATES THE TIRES ARE FIRESTONES. TECH SEEKING
         KNOWNS ON THIS CONCERN.
RECOMM   ADVISED TECH CONCERN IS UNDER INVESTAGATION. SUGGESTED TECH TRY A
         DIFFERENT BRAND OF TIRE AND RELEASE TO CUSTOMER.

------------------------- C O N C E R N    D E T A I L S -------------------

---------------- D I A G N O S T I C    I N F O R M A T I O N ---------------
Symp. Verif?:        Ease of Diagnosis:                   Level of Assistance: E1
Comp. Timing:        Base Timing       :                  MIL light on?       :
Test Stand   :       Road Test         :                  8D Number:
Prior Repair Attempts:                                   Repair Prior to Call: NO
DTCs KOEO:                                  KOEC:
     KOER:                                    CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used      Effective?

------------------------- S E R V I C E    A C T I O N S --------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

----------------------- V E H I C L E  D E T A I L S -------------------------
Vehicle Build Date:          05/04/1998    Warranty Start Date:          06/10/1998
Date of Sale:                06/10/1998    Selling Dlr (Mkt,Dlr,Sub):   06917
Dealer Special Order:                      Gross Vehicle Weight:
LH/RH Drive:
                           - - - E N G I N E - - -
Engine: 3.0L EFI                           Tag: 8G            580 AA
Bld Dt:             Calb:   856FR15 A         Serial #:
                      - - - T R A N S M I S S I O N - - -
Trans: 4R44E 4SP AUTO                      Part #:
Bld Dt:                                     Serial #:
Model:                          Plt:                                  Shft:
                              - - - A X L E - - -
Axle:  2750# FORD 3.73 CONVE    Id Tag Code:              Bld Dt:
Serial #:                                                    Plt:
                         - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S     Brand     :
Radio : ELETR AM/FM/STRO/CSTE/CLOCK    A/C       : MANUAL AIR CONDITIONER
```

REDACTED

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Page:  02                  CQIS DETAIL REPORT                 08/03/00 18:08:44

CQIS Report Number: WJADS022  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 10/01/1998

Paint : BLUE-GREEN EXT PAINT FAMILY    ---------  DEEP JEWEL GREEN C/C

--------------A F T E R   M A R K E T   M O D I F I C A T I O N S------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : TRACY NEWSOME                     Title: TECHNICIAN

Rpair Dlr:   02968   - Fairway Ford Tyler                 Ph#:(903) 597-9331
City:     Tyler                        State    : Texas
Country:  UNITED STATES                Region   : Southwest - 52

Specialist's
Name         : JUSTIN MANNING (FSE)
----------------------C Q I S   V I N   H I S T O R Y----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY      ---

         SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
          Repair     Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID Date       Order  (Miles)   Nbr Cond. Pfx  Base     Sfx   Operation
--------- ---------- ------ --------- --- ----- ---- -------- ----- ----------
02968     11/10/1999 106582     19251 1    42            DIAG        12650D
02968     11/10/1999 106582     19251 1    42                        12650D80
```

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Page:  01                    CQIS DETAIL REPORT                  08/03/00 18:08:46

CQIS Report Number: WJNGX002  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 10/14/1998

------------------------ R E P O R T   S U M M A R Y ----------------------

VEHICLE:       1998 RANGER 4X2,REGCAB ,PICKUP      VIN      : [redacted]
Engine :            3.0L EFI                       Odometer:   3,469 MILES
Operating Environ:                                 WCC      :
Vehicle Use      :                                 Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                         TIRES/WHEELS
                   TIRE WEAR                       CONCERN NOT LISTED
Additional Symptom: TIRE WEAR
Other Veh. With Concern:      Severity Rating - Customer:       Engineering:

Causal Component:
Causal Factor:                       Feature:                   Loc:
Causal Condition:                                  Photo:        Images:  0
Component Test Status:                   ---- Return Loc:
Vehicle Fixed?:         Customer satisfied?:       Repair Effectiveness (%):

-------------------------------- C O M M E N T S ---------------------------
--TYPE-- -------------------------- COMMENT TEXT ---------------------------
REPAIR   TECH STATES THAT HAS EXCESSIVE TIRE WEAR..TECH HAS INSPECTED THE ALIGN
         NO PROBLEM FOUND..TECH SEEKING KNOWNS.
RECOMM   ADV TECH TO ROTATE THE TIRES..ALSO ADV THAT THE CONCERN IS UNDER
         INVESTIGATION..

----------------------- C O N C E R N   D E T A I L S ----------------------

---------------- D I A G N O S T I C   I N F O R M A T I O N ---------------
Symp. Verif?:       Ease of Diagnosis:                Level of Assistance: E1
Comp. Timing:       Base Timing      :                MIL light on?       :
Test Stand  :       Road Test        :                8D Number:
Prior Repair Attempts:                               Repair Prior to Call: NO
DTCs KOEO:                                KOEC:
     KOER:                                  CB:
Equipment/Procedure Used       Effective? Equipment/Procedure Used     Effective?

------------------------ S E R V I C E   A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE


---------------------- V E H I C L E  D E T A I L S -----------------------
Vehicle Build Date:         03/30/1998     Warranty Start Date:         04/16/1998
Date of Sale:               04/16/1998     Selling Dlr (Mkt,Dlr,Sub):   05395
Dealer Special Order:                      Gross Vehicle Weight:
LH/RH Drive:
                              - - - E N G I N E - - -
Engine: 3.0L EFI                           Tag: 8G          580 AA
Bld Dt:             Calb:   856SR05 N        Serial #:
                         - - - T R A N S M I S S I O N - - -
Trans: 4R44E 4SP AUTO                      Part #:
Bld Dt:                                      Serial #:
Model:                         Plt:                               Shft:
                               - - - A X L E - - -
Axle:  2750# FORD 3.73 CONVE    Id Tag Code:              Bld Dt:
Serial #:                                                    Plt:
                         - - - A D D I T I O N A L - - -
Tire  : P205/75R14SL S/BLT BSW A-S     Brand     :
Radio : ELECTRONIC AM/FM/STRO/CLOCK    A/C       :
Paint : NEUTRAL EXT PAINT FAMILY A    ---------  OXFORD WHITE SOLID C/C
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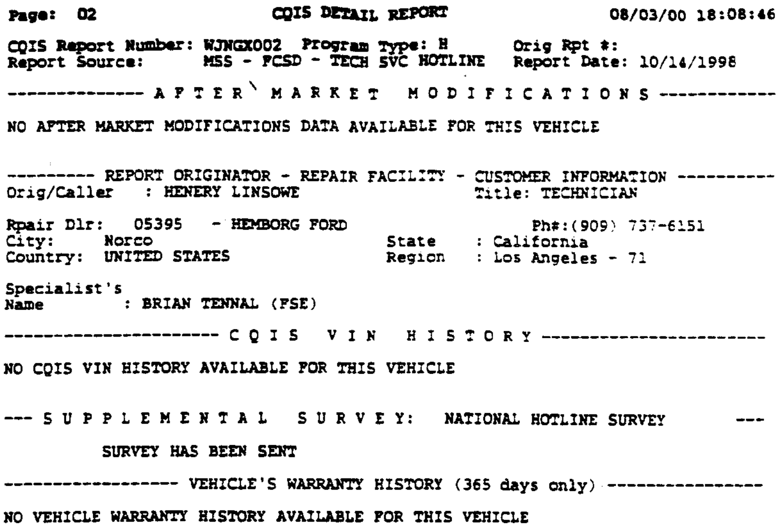
REDACTED



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Page:  02                CQIS DETAIL REPORT              08/03/00 18:08:46

CQIS Report Number: WJNGX002  Program Type: H       Orig Rpt #:
Report Source:       MSS - FCSD - TECH SVC HOTLINE   Report Date: 10/14/1998

-------------- A F T E R  M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller   : HENERY LINSOWE                   Title: TECHNICIAN

Rpair Dlr:   05395   - HEMBORG FORD                    Ph#:(909) 737-6151
City:      Norco                        State    : California
Country:  UNITED STATES                 Region   : Los Angeles - 71

Specialist's
Name        : BRIAN TENNAL (FSE)
---------------------- C Q I S   V I N   H I S T O R Y -----------------------

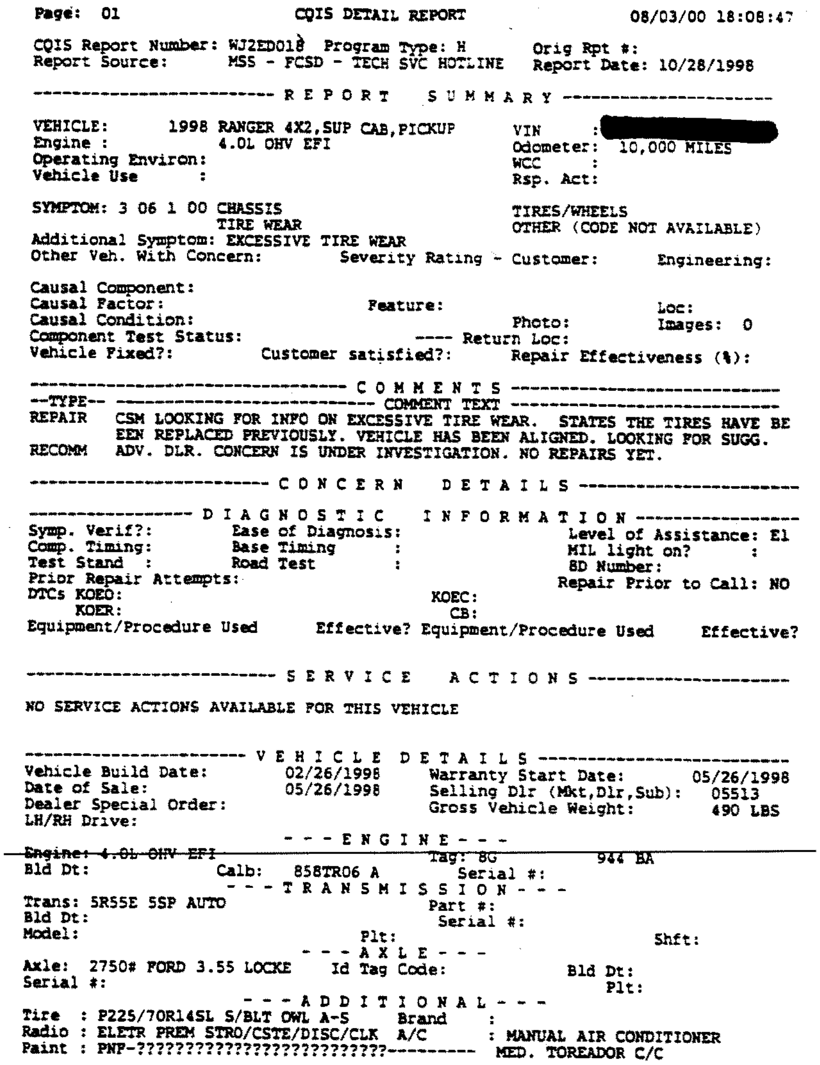
NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY       ---

          SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------

NO VEHICLE WARRANTY HISTORY AVAILABLE FOR THIS VEHICLE
```



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Page:  01                   CQIS DETAIL REPORT                08/03/00 18:08:47

CQIS Report Number: WJ2ED018  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 10/28/1998

------------------------- R E P O R T   S U M M A R Y ---------------------

VEHICLE:       1998 RANGER 4X2,SUP CAB,PICKUP      VIN      :[redacted]
Engine :            4.0L OHV EFI                   Odometer:  10,000 MILES
Operating Environ:                                 WCC      :
Vehicle Use      :                                 Rsp. Act:

SYMPTOM: 3 06 1 00 CHASSIS                         TIRES/WHEELS
                   TIRE WEAR                       OTHER (CODE NOT AVAILABLE)
Additional Symptom: EXCESSIVE TIRE WEAR
Other Veh. With Concern:       Severity Rating - Customer:       Engineering:

Causal Component:
Causal Factor:                     Feature:                      Loc:
Causal Condition:                                  Photo:        Images:  0
Component Test Status:                  ---- Return Loc:
Vehicle Fixed?:        Customer satisfied?:        Repair Effectiveness (%):

---------------------------------- C O M M E N T S ------------------------------
--TYPE-- --------------------------- COMMENT TEXT -------------------------------
REPAIR   CSM LOOKING FOR INFO ON EXCESSIVE TIRE WEAR.  STATES THE TIRES HAVE BE
         EEN REPLACED PREVIOUSLY. VEHICLE HAS BEEN ALIGNED. LOOKING FOR SUGG.
RECOMM   ADV. DLR. CONCERN IS UNDER INVESTIGATION. NO REPAIRS YET.

------------------------- C O N C E R N   D E T A I L S -----------------------

---------------- D I A G N O S T I C   I N F O R M A T I O N ----------------
Symp. Verif?:        Ease of Diagnosis:                Level of Assistance: E1
Comp. Timing:        Base Timing      :                MIL light on?       :
Test Stand  :        Road Test        :                8D Number:
Prior Repair Attempts:                                Repair Prior to Call: NO
DTCs KOEO:                                 KOEC:
     KOER:                                   CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used     Effective?

------------------------- S E R V I C E   A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

----------------------- V E H I C L E   D E T A I L S -------------------------
Vehicle Build Date:          02/26/1998    Warranty Start Date:         05/26/1998
Date of Sale:                05/26/1998    Selling Dlr (Mkt,Dlr,Sub):   05513
Dealer Special Order:                      Gross Vehicle Weight:        490 LBS
LH/RH Drive:
                            - - - E N G I N E - - -
~~Engine: 4.0L OHV EFI~~                          Tag: 8G              944 BA
Bld Dt:               Calb:   858TR06 A       Serial #:
                       - - - T R A N S M I S S I O N - - -
Trans: 5R55E 5SP AUTO                          Part #:
Bld Dt:                                          Serial #:
Model:                            Plt:                             Shft:
                                - - - A X L E - - -
Axle:  2750# FORD 3.55 LOCKE    Id Tag Code:                Bld Dt:
Serial #:                                                       Plt:
                          - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S     Brand    :
Radio : ELETR PREM STRO/CSTE/DISC/CLK  A/C      : MANUAL AIR CONDITIONER
Paint : PNF-?????????????????????????---------  MED. TOREADOR C/C
```

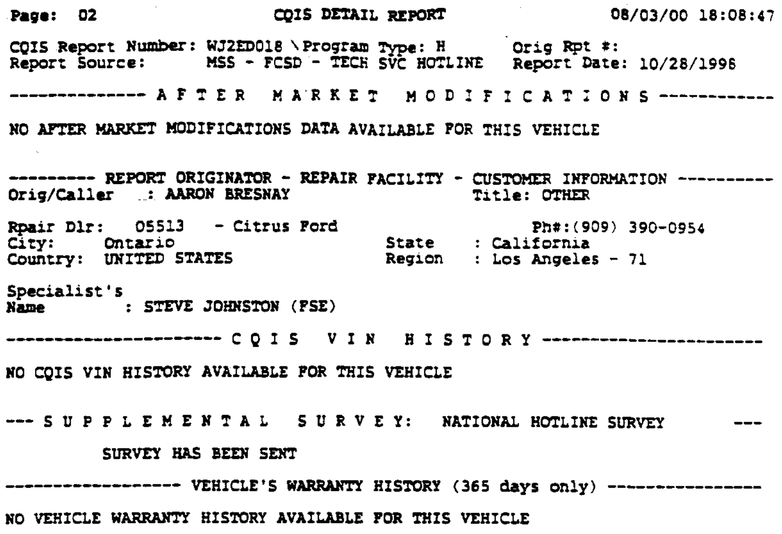

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Page:  02                  CQIS DETAIL REPORT                 08/03/00 18:08:47

CQIS Report Number: WJ2ED018 \Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 10/28/1996

--------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


---------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : AARON BRESNAY                        Title: OTHER

Rpair Dlr:   05513   - Citrus Ford                           Ph#:(909) 390-0954
City:     Ontario                         State    : California
Country:  UNITED STATES                   Region   : Los Angeles - 71

Specialist's
Name         : STEVE JOHNSTON (FSE)
----------------------- C Q I S   V I N   H I S T O R Y -----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY        ---

          SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) -----------------

NO VEHICLE WARRANTY HISTORY AVAILABLE FOR THIS VEHICLE
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Page:  01                      CQIS DETAIL REPORT                08/03/00 18:07:05

CQIS Report Number: WJ3CE013  Program Type: H        Orig Rpt #:
Report Source:       MSS - FCSD - TECH SVC HOTLINE   Report Date: 10/29/1998

------------------------- R E P O R T   S U M M A R Y ----------------------

VEHICLE:       1998 RANGER 4X2,SUP CAB,PICKUP       VIN      : [redacted]
Engine :            4.0L OHV EFI                    Odometer:    8,922 MILES
Operating Environ:                                  WCC      :
Vehicle Use      :                                  Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                          TIRES/WHEELS
                   TIRE WEAR                        CONCERN NOT LISTED
Additional Symptom: VIBRATION 55 MPH TIRE WEAR
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                          Feature:                     Loc:
Causal Condition:                                   Photo:           Images:  0
Component Test Status:                     ---- Return Loc:
Vehicle Fixed?:        Customer satisfied?:         Repair Effectiveness (%):

---------------------------------- C O M M E N T S ----------------------------
--TYPE-- ---------------------------- COMMENT TEXT -----------------------------
REPAIR   TECH STATES THAT THE OWNER CLAIMS THAT THE VEHICLE HAS A VIBRATION
         AT ANOUT 55 MPH.  STATES HAS REPLACED THE TIRES BECAUSE THEY WERE OUT
         OF ROUND.  STATES NOW THE VEHICLE IS BACK WITH TIRE WEAR ON THE NEW
         SET OF TIRES.  TECH LOOKING FOR ANY KNOWNS.
RECOMM   ISM 98-10-010   CONTACT DIANO TARABOCHIA AT EDISON PLANT 9-1-632-4833
         ADV TECH TO CHECK THE RUNOUT AND BALANCE OF THE TIRES.  ADV THAT THE
         CONCERN IS UNDER INVESTIGATION.

------------------------- C O N C E R N   D E T A I L S ----------------------

----------------- D I A G N O S T I C   I N F O R M A T I O N ----------------
Symp. Verif?:        Ease of Diagnosis:                  Level of Assistance: E1
Comp. Timing:        Base Timing       :                 MIL light on?       :
Test Stand  :        Road Test         :                 8D Number:
Prior Repair Attempts:                                  Repair Prior to Call: NO
DTCs KOEO:                                  KOEC:
     KOER:                                    CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used     Effective?


-------------------------- S E R V I C E   A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE


----------------------- V E H I C L E  D E T A I L S -------------------------
Vehicle Build Date:          02/27/1998     Warranty Start Date:        05/16/1998
Date of Sale:                05/16/1998     Selling Dlr (Mkt,Dlr,Sub):   03999
Dealer Special Order:                       Gross Vehicle Weight:
LH/RH Drive:
                              - - - E N G I N E - - -
Engine: 4.0L OHV EFI                        Tag: 8G           944 BA
Bld Dt:               Calb:   858TR06 A        Serial #:
                         - - - T R A N S M I S S I O N - - -
Trans: 5R55E 5SP AUTO                       Part #:
Bld Dt:                                      Serial #:
Model:                           Plt:                                   Shft:
                                   - - - A X L E - - -
Axle:  2750# FORD 3.55 CONVE    Id Tag Code:              Bld Dt:
Serial #:                                                     Plt:
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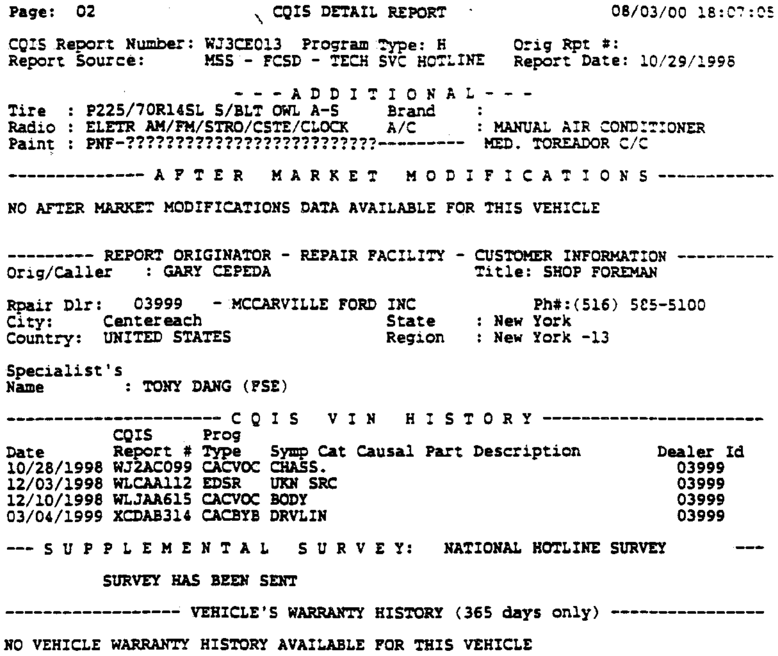

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Page:  02                    CQIS DETAIL REPORT                    08/03/00 18:07:05

CQIS Report Number: WJ3CE013  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 10/29/1998

                         - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S      Brand      :
Radio : ELETR AM/FM/STRO/CSTE/CLOCK     A/C        : MANUAL AIR CONDITIONER
Paint : PNF-??????????????????????????---------   MED. TOREADOR C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : GARY CEPEDA                     Title: SHOP FOREMAN

Rpair Dlr:   03999   - MCCARVILLE FORD INC            Ph#:(516) 585-5100
City:      Centereach                    State     : New York
Country:   UNITED STATES                 Region    : New York -13

Specialist's
Name          : TONY DANG (FSE)

---------------------- C Q I S   V I N   H I S T O R Y -----------------------
           CQIS      Prog
Date       Report #  Type   Symp Cat Causal Part Description         Dealer Id
10/28/1998 WJ2AC099 CACVOC CHASS.                                      03999
12/03/1998 WLCAA112 EDSR   UKN SRC                                     03999
12/10/1998 WLJAA615 CACVOC BODY                                        03999
03/04/1999 XCDAB314 CACBYB DRVLIN                                      03999

--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY       ---

          SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------

NO VEHICLE WARRANTY HISTORY AVAILABLE FOR THIS VEHICLE
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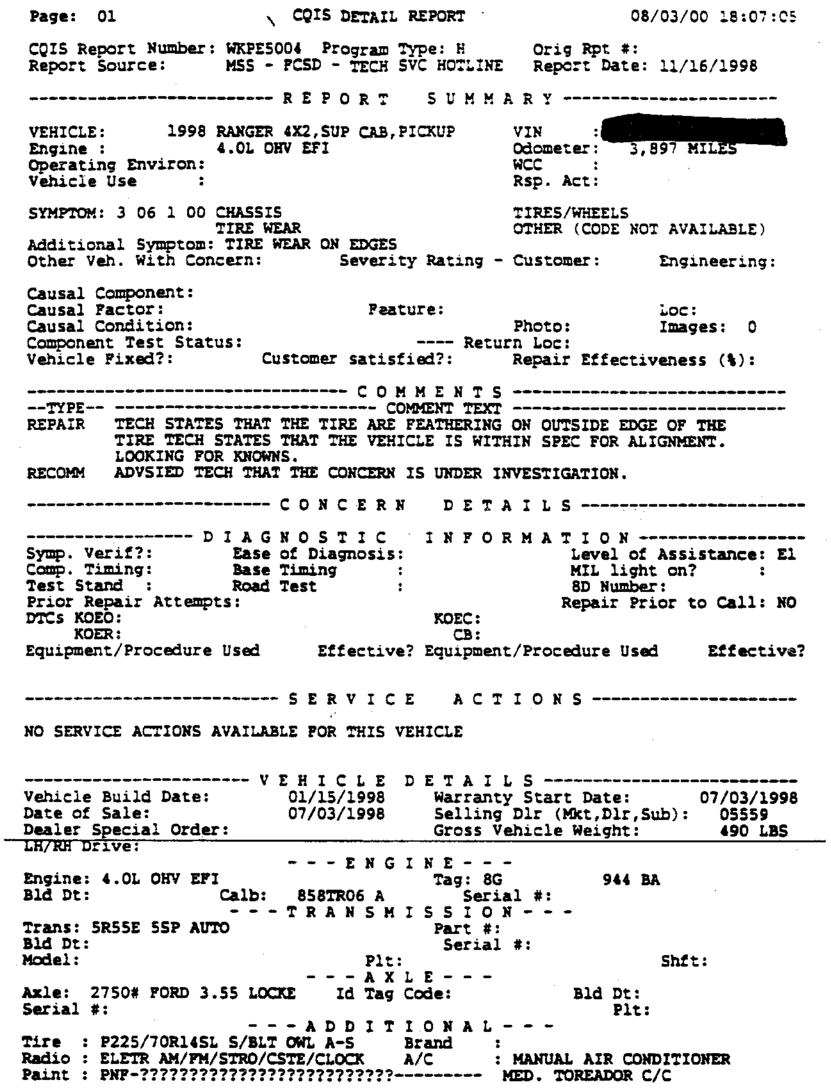

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Page:  01                \  CQIS DETAIL REPORT                    08/03/00 18:07:05

CQIS Report Number: WKPE5004  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 11/16/1998

------------------------- R E P O R T   S U M M A R Y ---------------------

VEHICLE:       1998 RANGER 4X2,SUP CAB,PICKUP       VIN      :[redacted]
Engine :              4.0L OHV EFI                  Odometer:   3,897 MILES
Operating Environ:                                  WCC      :
Vehicle Use      :                                  Rsp. Act:

SYMPTOM: 3 06 1 00 CHASSIS                          TIRES/WHEELS
                   TIRE WEAR                        OTHER (CODE NOT AVAILABLE)
Additional Symptom: TIRE WEAR ON EDGES
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                     Feature:                      Loc:
Causal Condition:                                   Photo:       Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:        Customer satisfied?:         Repair Effectiveness (%):

---------------------------------- C O M M E N T S -----------------------------
--TYPE-- ---------------------------- COMMENT TEXT -----------------------------
REPAIR   TECH STATES THAT THE TIRE ARE FEATHERING ON OUTSIDE EDGE OF THE
         TIRE TECH STATES THAT THE VEHICLE IS WITHIN SPEC FOR ALIGNMENT.
         LOOKING FOR KNOWNS.
RECOMM   ADVSIED TECH THAT THE CONCERN IS UNDER INVESTIGATION.

-------------------------- C O N C E R N   D E T A I L S ------------------------

----------------- D I A G N O S T I C   I N F O R M A T I O N -----------------
Symp. Verif?:         Ease of Diagnosis:                  Level of Assistance: E1
Comp. Timing:         Base Timing       :                 MIL light on?       :
Test Stand  :         Road Test         :                 8D Number:
Prior Repair Attempts:                                   Repair Prior to Call: NO
DTCs KOEO:                                KOEC:
     KOER:                                  CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used     Effective?

--------------------------- S E R V I C E   A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

------------------------ V E H I C L E  D E T A I L S -------------------------
Vehicle Build Date:         01/15/1998    Warranty Start Date:          07/03/1998
Date of Sale:               07/03/1998    Selling Dlr (Mkt,Dlr,Sub):    05559
Dealer Special Order:                     Gross Vehicle Weight:         490 LBS
LH/RH Drive:
                              - - - E N G I N E - - -
Engine: 4.0L OHV EFI                      Tag: 8G           944 BA
Bld Dt:              Calb:   858TR06 A       Serial #:
                          - - - T R A N S M I S S I O N - - -
Trans: 5R55E 5SP AUTO                     Part #:
Bld Dt:                                    Serial #:
Model:                          Plt:                                 Shft:
                                - - - A X L E - - -
Axle:  2750# FORD 3.55 LOCKE    Id Tag Code:               Bld Dt:
Serial #:                                                     Plt:
                           - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S     Brand    :
Radio : ELETR AM/FM/STRO/CSTE/CLOCK    A/C      : MANUAL AIR CONDITIONER
Paint : PNF-?????????????????????????---------  MED. TOREADOR C/C
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Page:  02                  CQIS DETAIL REPORT                   08/03/00 18:07:05

CQIS Report Number: WKPE5004  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 11/16/1998

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


---------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : JACK BATSON                      Title: TECHNICIAN

Rpair Dlr:   05513   - Citrus Ford                        Ph#:(909) 390-0954
City:      Ontario                       State    : California
Country:   UNITED STATES                 Region   : Los Angeles - 71

Specialist's
Name         : JOSHUA STOLLFUSS

---------------------- C Q I S   V I N   H I S T O R Y ----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY       ---

          SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------

NO VEHICLE WARRANTY HISTORY AVAILABLE FOR THIS VEHICLE
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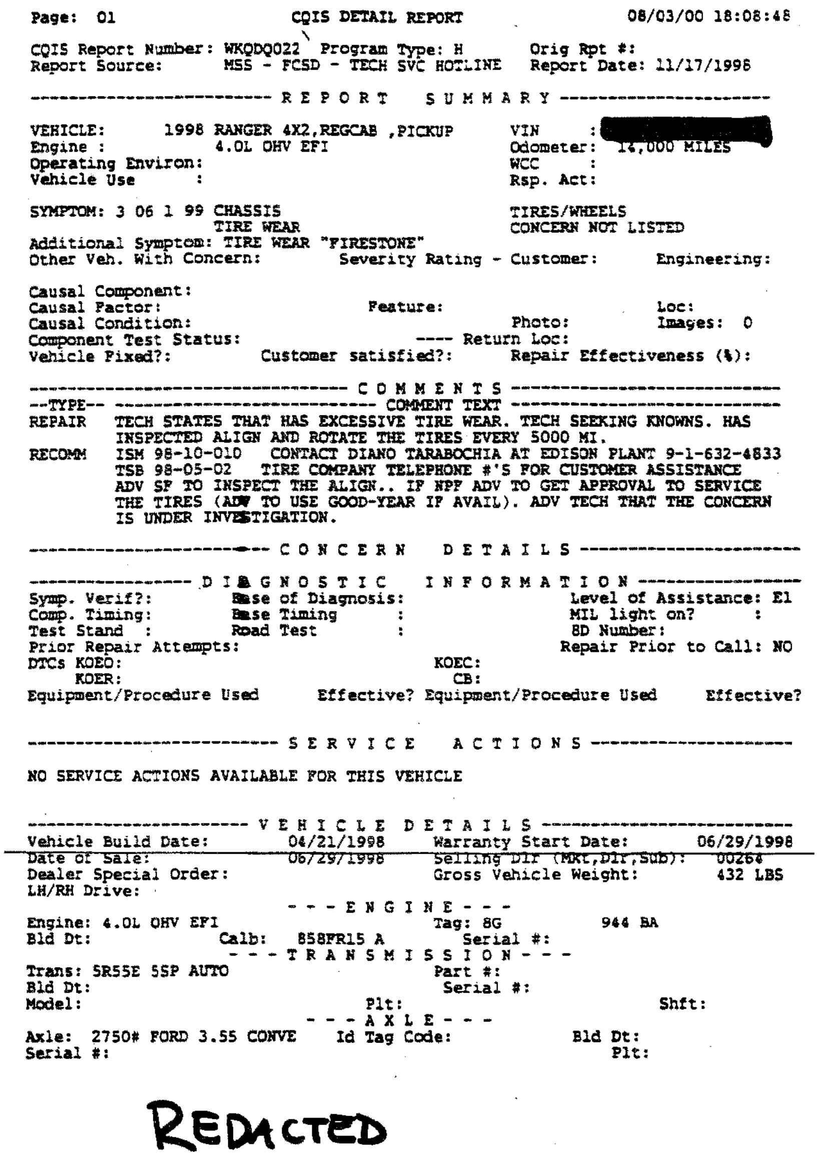

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Page:  01                  CQIS DETAIL REPORT                  08/03/00 18:08:48

CQIS Report Number: WKQDQ022  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 11/17/1998

------------------------- R E P O R T   S U M M A R Y ----------------------

VEHICLE:      1998 RANGER 4X2,REGCAB ,PICKUP     VIN      : [redacted]
Engine :            4.0L OHV EFI                 Odometer:  14,000 MILES
Operating Environ:                               WCC      :
Vehicle Use      :                               Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                       TIRES/WHEELS
                   TIRE WEAR                     CONCERN NOT LISTED
Additional Symptom: TIRE WEAR "FIRESTONE"
Other Veh. With Concern:       Severity Rating - Customer:     Engineering:

Causal Component:
Causal Factor:                     Feature:                    Loc:
Causal Condition:                                Photo:        Images:  0
Component Test Status:                   ---- Return Loc:
Vehicle Fixed?:         Customer satisfied?:     Repair Effectiveness (%):

-------------------------------- C O M M E N T S --------------------------
--TYPE-- --------------------------- COMMENT TEXT --------------------------
REPAIR   TECH STATES THAT HAS EXCESSIVE TIRE WEAR. TECH SEEKING KNOWNS. HAS
         INSPECTED ALIGN AND ROTATE THE TIRES EVERY 5000 MI.
RECOMM   ISM 98-10-010   CONTACT DIANO TARABOCHIA AT EDISON PLANT 9-1-632-4833
         TSB 98-05-02   TIRE COMPANY TELEPHONE #'S FOR CUSTOMER ASSISTANCE
         ADV SF TO INSPECT THE ALIGN.. IF NPF ADV TO GET APPROVAL TO SERVICE
         THE TIRES (ADV TO USE GOOD-YEAR IF AVAIL). ADV TECH THAT THE CONCERN
         IS UNDER INVESTIGATION.

----------------------- C O N C E R N   D E T A I L S ----------------------

---------------- D I A G N O S T I C   I N F O R M A T I O N ---------------
Symp. Verif?:        Base of Diagnosis:                  Level of Assistance: El
Comp. Timing:        Base Timing       :                 MIL light on?      :
Test Stand  :        Road Test         :                 8D Number:
Prior Repair Attempts:                                  Repair Prior to Call: NO
DTCs KOEO:                               KOEC:
     KOER:                                 CB:
Equipment/Procedure Used     Effective? Equipment/Procedure Used     Effective?

------------------------- S E R V I C E   A C T I O N S --------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

---------------------- V E H I C L E  D E T A I L S ------------------------
Vehicle Build Date:          04/21/1998   Warranty Start Date:          06/29/1998
Date of Sale:                06/29/1998   Selling Dlr (Mkt,Dlr,Sub):    00264
Dealer Special Order:                     Gross Vehicle Weight:          432 LBS
LH/RH Drive:
                           - - - E N G I N E - - -
Engine: 4.0L OHV EFI                      Tag: 8G           944 BA
Bld Dt:              Calb:   858FR15 A       Serial #:
                     - - - T R A N S M I S S I O N - - -
Trans: 5R55E 5SP AUTO                     Part #:
Bld Dt:                                     Serial #:
Model:                          Plt:                                 Shft:
                             - - - A X L E - - -
Axle:  2750# FORD 3.55 CONVE    Id Tag Code:             Bld Dt:
Serial #:                                                    Plt:
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REDACTED

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Page:  02                   CQIS DETAIL REPORT                08/03/00 18:08:48

CQIS Report Number: WKQDQ022  Program Type: H         Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE     Report Date: 11/17/1998

                            - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S      Brand    :
Radio : ELETR AM/FM/STRO/CSTE/CLOCK     A/C      : MANUAL AIR CONDITIONER
Paint : GREEN-YELLOW EXT PAINT FAMILY ---------  EBONY SOLID C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller   : RAY BOWER                        Title: SHOP FOREMAN

Rpair Dlr:   00402   - AKINS FORD CORP                  Ph#:(800) 282-7872
City:      Winder                        State    : Georgia
Country:  UNITED STATES                  Region   : Atlanta - 21

Specialist's
Name         : BRIAN TENNAL (FSE)
---------------------- C Q I S   V I N   H I S T O R Y -----------------------

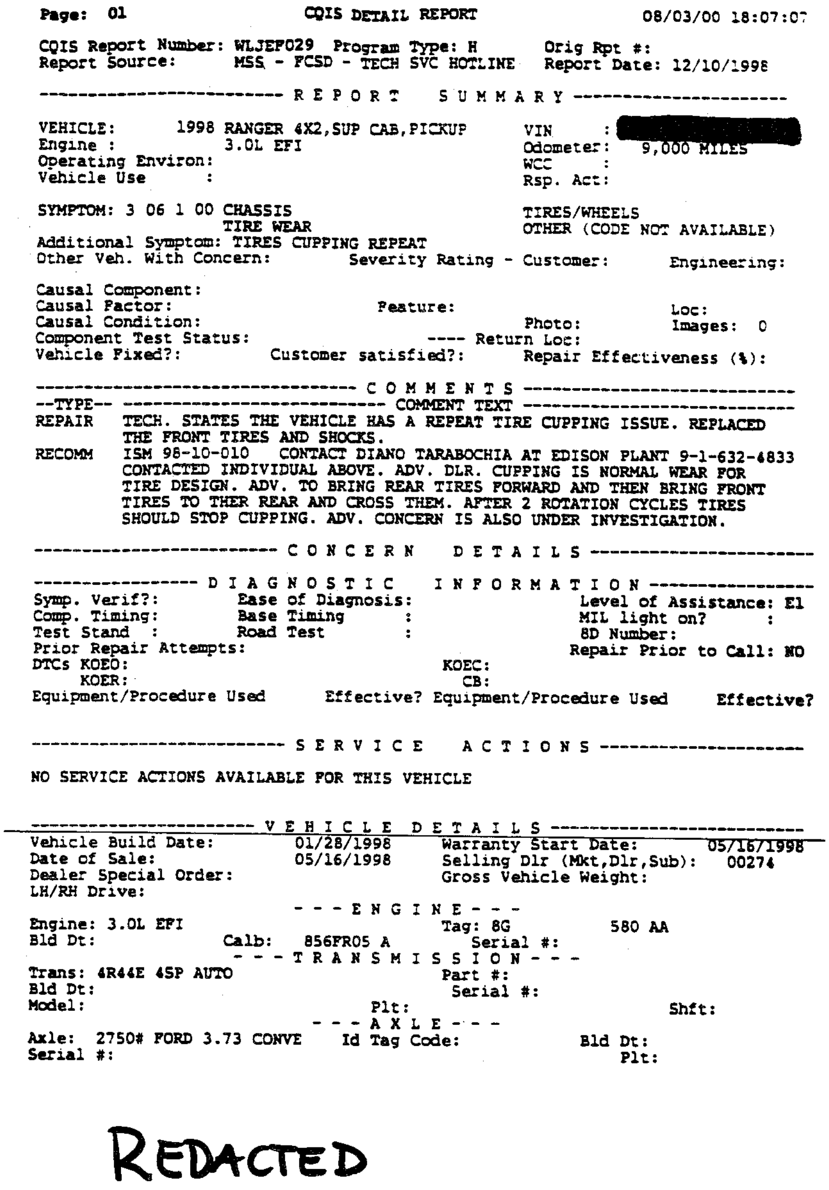
NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY        ---

          SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------

NO VEHICLE WARRANTY HISTORY AVAILABLE FOR THIS VEHICLE
```



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Page:  01                  CQIS DETAIL REPORT                 08/03/00 18:07:07

CQIS Report Number: WLJEF029  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 12/10/1998

------------------------- R E P O R T   S U M M A R Y ----------------------

VEHICLE:        1998 RANGER 4X2,SUP CAB,PICKUP        VIN      : [redacted]
Engine :             3.0L EFI                         Odometer:   9,000 MILES
Operating Environ:                                    WCC      :
Vehicle Use        :                                  Rsp. Act:

SYMPTOM: 3 06 1 00 CHASSIS                            TIRES/WHEELS
                   TIRE WEAR                          OTHER (CODE NOT AVAILABLE)
Additional Symptom: TIRES CUPPING REPEAT
Other Veh. With Concern:         Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                        Feature:                     Loc:
Causal Condition:                                     Photo:       Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:        Customer satisfied?:      Repair Effectiveness (%):

--------------------------------- C O M M E N T S ----------------------------
--TYPE-- ---------------------------- COMMENT TEXT ----------------------------
REPAIR   TECH. STATES THE VEHICLE HAS A REPEAT TIRE CUPPING ISSUE. REPLACED
         THE FRONT TIRES AND SHOCKS.
RECOMM   ISM 98-10-010   CONTACT DIANO TARABOCHIA AT EDISON PLANT 9-1-632-4833
         CONTACTED INDIVIDUAL ABOVE. ADV. DLR. CUPPING IS NORMAL WEAR FOR
         TIRE DESIGN. ADV. TO BRING REAR TIRES FORWARD AND THEN BRING FRONT
         TIRES TO THER REAR AND CROSS THEM. AFTER 2 ROTATION CYCLES TIRES
         SHOULD STOP CUPPING. ADV. CONCERN IS ALSO UNDER INVESTIGATION.

------------------------- C O N C E R N   D E T A I L S -----------------------

----------------- D I A G N O S T I C   I N F O R M A T I O N -----------------
Symp. Verif?:        Ease of Diagnosis:                  Level of Assistance: E1
Comp. Timing:        Base Timing       :                 MIL light on?       :
Test Stand  :        Road Test         :                 8D Number:
Prior Repair Attempts:                                  Repair Prior to Call: NO
DTCs KOEO:                                 KOEC:
     KOER:                                   CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used     Effective?

-------------------------- S E R V I C E   A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

---------------------- V E H I C L E  D E T A I L S -------------------------
Vehicle Build Date:          01/28/1998     Warranty Start Date:        05/16/1998
Date of Sale:                05/16/1998     Selling Dlr (Mkt,Dlr,Sub):   00274
Dealer Special Order:                       Gross Vehicle Weight:
LH/RH Drive:
                             - - - E N G I N E - - -
Engine: 3.0L EFI                            Tag: 8G           580 AA
Bld Dt:              Calb:   856FR05 A        Serial #:
                         - - - T R A N S M I S S I O N - - -
Trans: 4R44E 4SP AUTO                       Part #:
Bld Dt:                                      Serial #:
Model:                           Plt:                                 Shft:
                               - - - A X L E - - -
Axle:  2750# FORD 3.73 CONVE    Id Tag Code:              Bld Dt:
Serial #:                                                     Plt:
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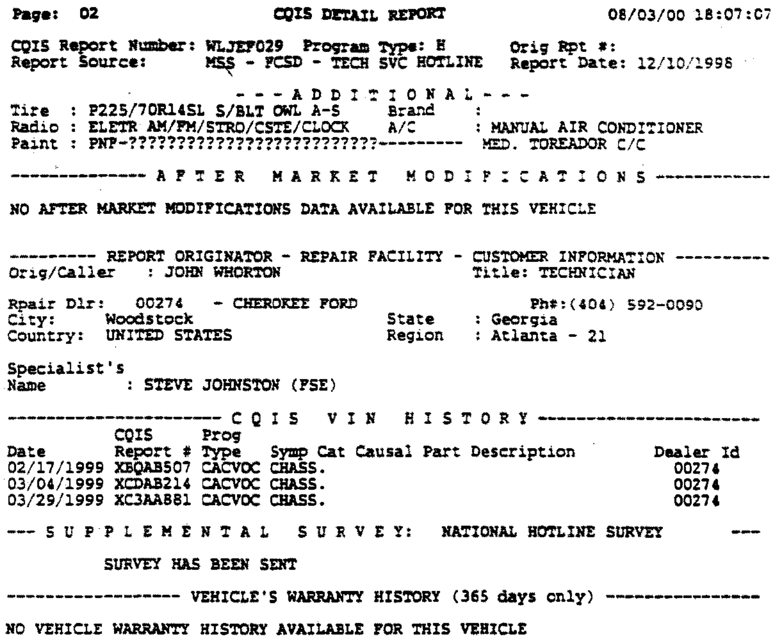
REDACTED



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Page:  02                   CQIS DETAIL REPORT                  08/03/00 18:07:07

CQIS Report Number: WLJEF029  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 12/10/1998

                          - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S     Brand     :
Radio : ELETR AM/FM/STRO/CSTE/CLOCK    A/C       : MANUAL AIR CONDITIONER
Paint : PNP-?????????????????????????---------  MED. TOREADOR C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller   : JOHN WHORTON                        Title: TECHNICIAN

Rpair Dlr:   00274   - CHEROKEE FORD                       Ph#:(404) 592-0090
City:      Woodstock                    State    : Georgia
Country:   UNITED STATES                Region   : Atlanta - 21

Specialist's
Name         : STEVE JOHNSTON (FSE)

---------------------- C Q I S   V I N   H I S T O R Y -----------------------
           CQIS     Prog
Date       Report # Type   Symp Cat Causal Part Description          Dealer Id
02/17/1999 XBQAB507 CACVOC CHASS.                                      00274
03/04/1999 XCDAB214 CACVOC CHASS.                                      00274
03/29/1999 XC3AA881 CACVOC CHASS.                                      00274

--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY        ---

          SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------

NO VEHICLE WARRANTY HISTORY AVAILABLE FOR THIS VEHICLE
```
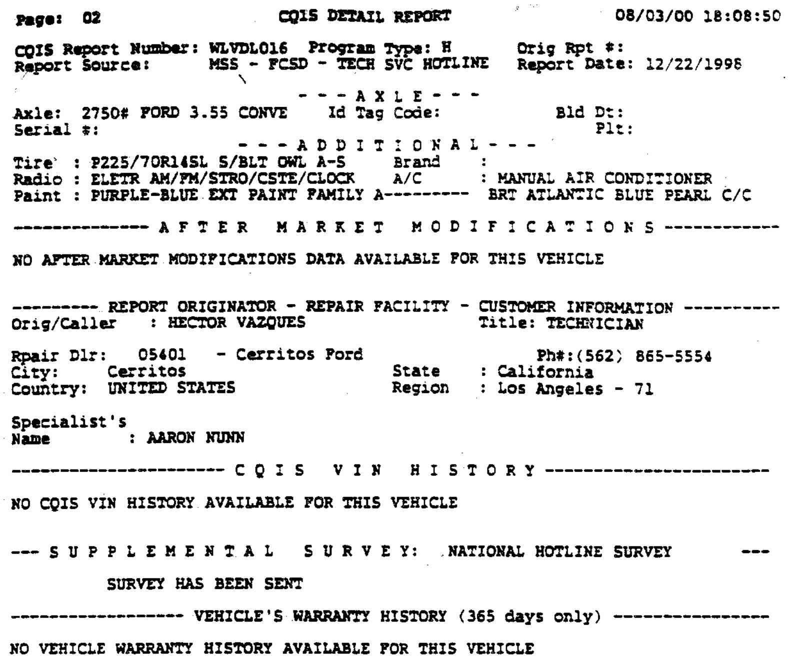

```
Page: 01                   CQIS DETAIL REPORT                  08/03/00 18:08:50

CQIS Report Number: WLVDL016  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 12/22/1998

------------------------- R E P O R T   S U M M A R Y ----------------------

VEHICLE:       1998 RANGER 4X2,SUP CAB,PICKUP       VIN      : [redacted]
Engine :            4.0L OHV EFI                    Odometer:   4,771 MILES
Operating Environ:                                  WCC      :
Vehicle Use      :                                  Rsp. Act:

SYMPTOM: 3 06 1 00 CHASSIS                          TIRES/WHEELS
                   TIRE WEAR                        OTHER (CODE NOT AVAILABLE)
Additional Symptom: TIRES FEATHERING
Other Veh. With Concern:      Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                     Feature:                       Loc:
Causal Condition:                                   Photo:        Images:  0
Component Test Status:                  ---- Return Loc:
Vehicle Fixed?:         Customer satisfied?:        Repair Effectiveness (%):

---------------------------------- C O M M E N T S ----------------------------
--TYPE-- ---------------------------- COMMENT TEXT ----------------------------
REPAIR   TECH STATES HAS A TIRE WEAR CONCERN. TECH STATES ALL FOUR TIRES ARE
         FEATHERING. TECH STATES ALIGNMENT IS IN SPEC. TECH SEEKING KNOWNS.
RECOMM   TSB 98-05-02   TIRE COMPANY TELEPHONE #'S FOR CUSTOMER ASSISTANCE
         ADV. TECH TO VERIFY THE VEHICLE ALIGNMENT AND CHECK BALANCE. ADV.
         TECH TO CHECK PRESSURES. ADV. IF EVERYTHING IS OK THEN CONTACT THE
         TIRE MANUFACTURER.
REPAIR   12/22/1998 04:26PM JOE CARPENTER(FSE)    MSS - FCSD - REG - SOUTHWEST
         THE DEALER STATES THAT THE VEHICLE HAS A CONCERN WITH TIRE WEAR.
          LOOKING FOR SUGG.
RECOMM   ADV TEH DEALER TO ROTATE TIRES FOR NOW, CONCERN IS UNDER INVESTIGATION
         .

------------------------- C O N C E R N   D E T A I L S ----------------------

----------------- D I A G N O S T I C   I N F O R M A T I O N -----------------
Symp. Verif?:         Ease of Diagnosis:                 Level of Assistance: E1
Comp. Timing:         Base Timing       :                MIL light on?       :
Test Stand  :         Road Test         :                8D Number:
Prior Repair Attempts:                                  Repair Prior to Call: NO
DTCs KOEO:                                  KOEC:
    KOER:                                     CB:
Equipment/Procedure Used        Effective? Equipment/Procedure Used     Effective?

-------------------------- S E R V I C E   A C T I O N S ----------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

----------------------- V E H I C L E   D E T A I L S -------------------------
Vehicle Build Date:          06/11/1998    Warranty Start Date:        08/15/1998
Date of Sale:                08/15/1998    Selling Dlr (Mkt,Dlr,Sub):   05401
Dealer Special Order:                      Gross Vehicle Weight:
LH/RH Drive:
                              - - - E N G I N E - - -
Engine: 4.0L OHV EFI                       Tag: 8G          944 BA
Bld Dt:                Calb:   858TR15 A      Serial #:
                         - - - T R A N S M I S S I O N - - -
Trans: 5R55E 5SP AUTO                      Part #:
Bld Dt:                                     Serial #:
Model:                         Plt:                                 Shft:
```

REDACTED



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Page: 02                CQIS DETAIL REPORT                  08/03/00 18:08:50

CQIS Report Number: WLVDL016  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 12/22/1998

                             - - - A X L E - - -
Axle:  2750# FORD 3.55 CONVE    Id Tag Code:            Bld Dt:
Serial #:                                                   Plt:
                       - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S     Brand     :
Radio : ELETR AM/FM/STRO/CSTE/CLOCK    A/C       : MANUAL AIR CONDITIONER
Paint : PURPLE-BLUE EXT PAINT FAMILY A---------  BRT ATLANTIC BLUE PEARL C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : HECTOR VAZQUES                     Title: TECHNICIAN

Rpair Dlr:   05401   - Cerritos Ford                      Ph#:(562) 865-5554
City:     Cerritos                     State    : California
Country:  UNITED STATES                Region   : Los Angeles - 71

Specialist's
Name       : AARON NUNN
---------------------- C Q I S   V I N   H I S T O R Y -----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY        ---

          SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------

NO VEHICLE WARRANTY HISTORY AVAILABLE FOR THIS VEHICLE
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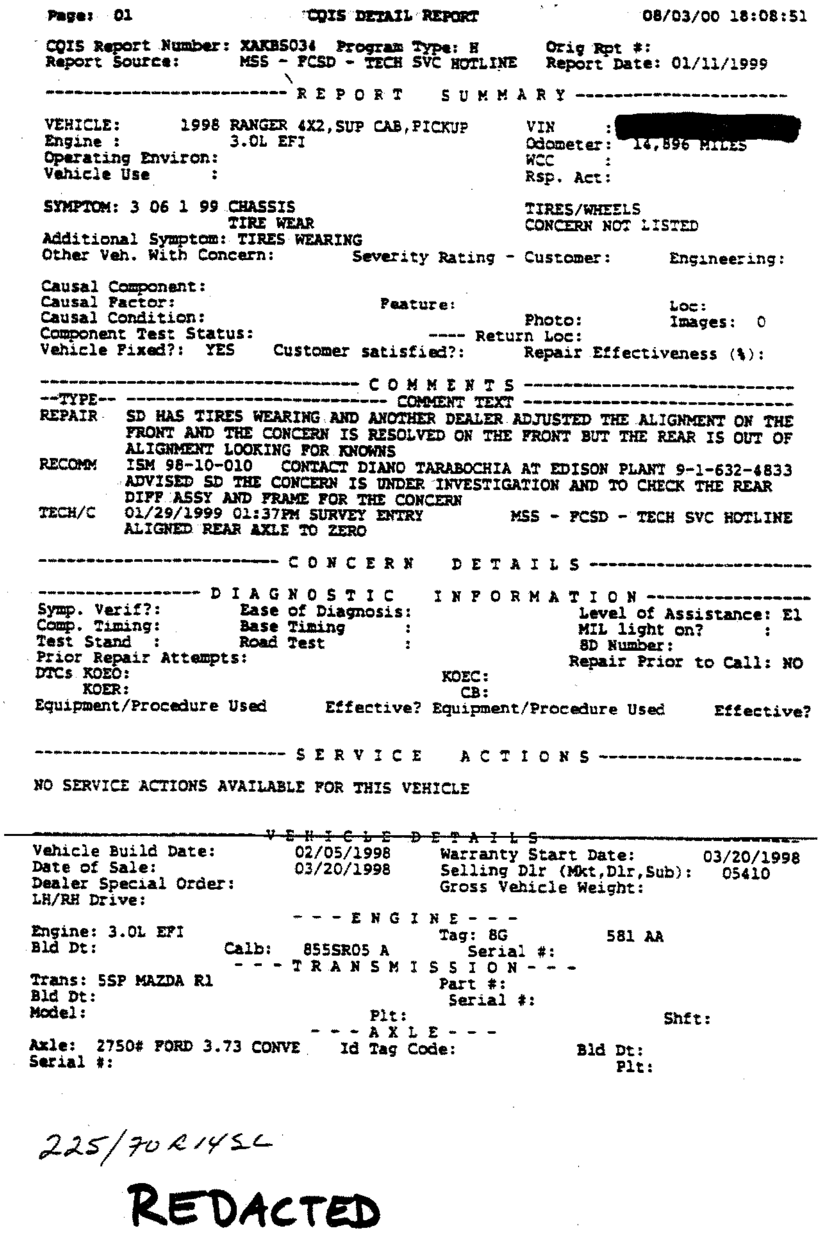

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Page: 01                 CQIS DETAIL REPORT                 08/03/00 18:08:51

CQIS Report Number: XAKBS034  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 01/11/1999

------------------------- R E P O R T   S U M M A R Y ---------------------

VEHICLE:       1998 RANGER 4X2,SUP CAB,PICKUP       VIN      : [redacted]
Engine :            3.0L EFI                        Odometer:  14,896 MILES
Operating Environ:                                  WCC      :
Vehicle Use       :                                 Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                          TIRES/WHEELS
                   TIRE WEAR                        CONCERN NOT LISTED
Additional Symptom: TIRES WEARING
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                        Feature:                    Loc:
Causal Condition:                                   Photo:        Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:  YES     Customer satisfied?:      Repair Effectiveness (%):

------------------------------- C O M M E N T S ---------------------------
--TYPE-- ------------------------- COMMENT TEXT ---------------------------
REPAIR   SD HAS TIRES WEARING AND ANOTHER DEALER ADJUSTED THE ALIGNMENT ON THE
         FRONT AND THE CONCERN IS RESOLVED ON THE FRONT BUT THE REAR IS OUT OF
         ALIGNMENT LOOKING FOR KNOWNS
RECOMM   ISM 98-10-010   CONTACT DIANO TARABOCHIA AT EDISON PLANT 9-1-632-4833
         ADVISED SD THE CONCERN IS UNDER INVESTIGATION AND TO CHECK THE REAR
         DIFF ASSY AND FRAME FOR THE CONCERN
TECH/C   01/29/1999 01:37PM SURVEY ENTRY          MSS - FCSD - TECH SVC HOTLINE
         ALIGNED REAR AXLE TO ZERO

----------------------- C O N C E R N   D E T A I L S ---------------------

---------------- D I A G N O S T I C   I N F O R M A T I O N -------------
Symp. Verif?:          Ease of Diagnosis:             Level of Assistance: E1
Comp. Timing:          Base Timing       :            MIL light on?        :
Test Stand  :          Road Test         :            8D Number:
Prior Repair Attempts:                                Repair Prior to Call: NO
DTCs KOEO:                                 KOEC:
     KOER:                                   CB:
Equipment/Procedure Used    Effective? Equipment/Procedure Used    Effective?

------------------------- S E R V I C E   A C T I O N S -------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

--------------------- V E H I C L E   D E T A I L S ------------------------
Vehicle Build Date:        02/05/1998    Warranty Start Date:        03/20/1998
Date of Sale:              03/20/1998    Selling Dlr (Mkt,Dlr,Sub):    05410
Dealer Special Order:                    Gross Vehicle Weight:
LH/RH Drive:
                             - - - E N G I N E - - -
Engine: 3.0L EFI                         Tag: 8G             581 AA
Bld Dt:                Calb:   855SR05 A    Serial #:
                         - - - T R A N S M I S S I O N - - -
Trans: 5SP MAZDA R1                      Part #:
Bld Dt:                                   Serial #:
Model:                         Plt:                                Shft:
                              - - - A X L E - - -
Axle:  2750# FORD 3.73 CONVE    Id Tag Code:            Bld Dt:
Serial #:                                                  Plt:
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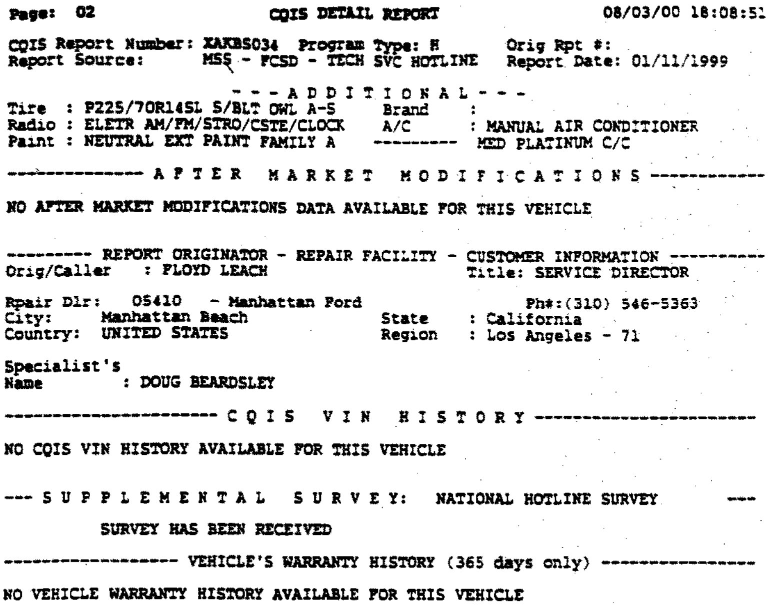
~~V E H I C L E   D E T A I L S~~

225/70R14SL

REDACTED



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Page:  02                    CQIS DETAIL REPORT                08/03/00 18:08:51

CQIS Report Number: XAKBS034  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 01/11/1999

                       - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-5      Brand      :
Radio : ELETR AM/FM/STRO/CSTE/CLOCK     A/C        : MANUAL AIR CONDITIONER
Paint : NEUTRAL EXT PAINT FAMILY A     ---------  MED PLATINUM C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE

--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : FLOYD LEACH                       Title: SERVICE DIRECTOR

Rpair Dlr:   05410   - Manhattan Ford                    Ph#:(310) 546-5363
City:      Manhattan Beach                State      : California
Country:   UNITED STATES                  Region     : Los Angeles - 71

Specialist's
Name          : DOUG BEARDSLEY

---------------------- C Q I S   V I N   H I S T O R Y ----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE

--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY        ---

         SURVEY HAS BEEN RECEIVED

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------

NO VEHICLE WARRANTY HISTORY AVAILABLE FOR THIS VEHICLE
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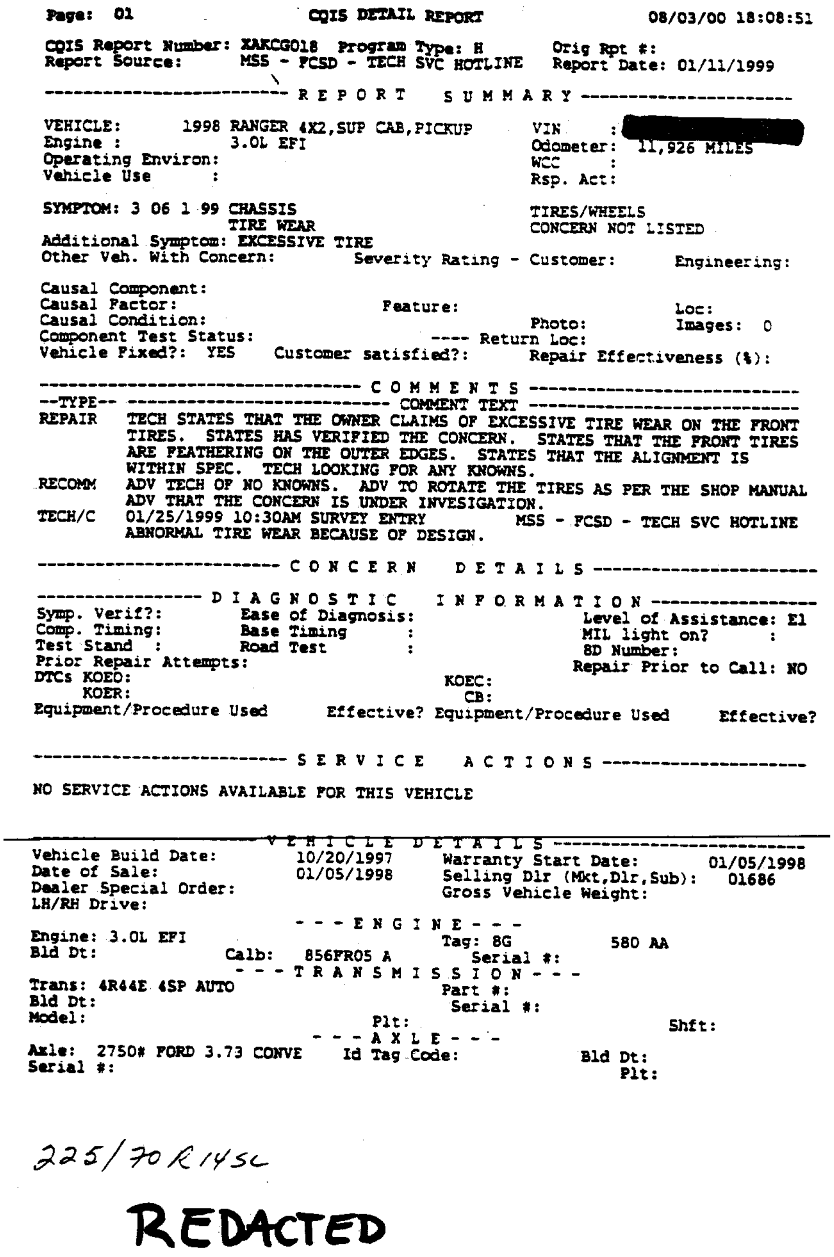

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Page: 01                    CQIS DETAIL REPORT                 08/03/00 18:08:51

CQIS Report Number: XAKCG018  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 01/11/1999
------------------------- REPORT SUMMARY ----------------------

VEHICLE:        1998 RANGER 4X2,SUP CAB,PICKUP       VIN     : [redacted]
Engine :             3.0L EFI                        Odometer:  11,926 MILES
Operating Environ:                                   WCC     :
Vehicle Use      :                                   Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                           TIRES/WHEELS
                   TIRE WEAR                         CONCERN NOT LISTED
Additional Symptom: EXCESSIVE TIRE
Other Veh. With Concern:       Severity Rating - Customer:       Engineering:

Causal Component:
Causal Factor:                      Feature:                       Loc:
Causal Condition:                                    Photo:        Images:  0
Component Test Status:                     ---- Return Loc:
Vehicle Fixed?:  YES    Customer satisfied?:     Repair Effectiveness (%):

--------------------------------- COMMENTS ----------------------------
--TYPE-- -------------------------- COMMENT TEXT ----------------------------
REPAIR   TECH STATES THAT THE OWNER CLAIMS OF EXCESSIVE TIRE WEAR ON THE FRONT
         TIRES.  STATES HAS VERIFIED THE CONCERN.  STATES THAT THE FRONT TIRES
         ARE FEATHERING ON THE OUTER EDGES.  STATES THAT THE ALIGNMENT IS
         WITHIN SPEC.  TECH LOOKING FOR ANY KNOWNS.
RECOMM   ADV TECH OF NO KNOWNS.  ADV TO ROTATE THE TIRES AS PER THE SHOP MANUAL
         ADV THAT THE CONCERN IS UNDER INVESIGATION.
TECH/C   01/25/1999 10:30AM SURVEY ENTRY          MSS - FCSD - TECH SVC HOTLINE
         ABNORMAL TIRE WEAR BECAUSE OF DESIGN.

------------------------- CONCERN DETAILS ----------------------

----------------- DIAGNOSTIC INFORMATION ----------------
Symp. Verif?:        Ease of Diagnosis:                  Level of Assistance: E1
Comp. Timing:        Base Timing      :                  MIL light on?       :
Test Stand   :       Road Test        :                  8D Number:
Prior Repair Attempts:                                  Repair Prior to Call: NO
DTCs KOEO:                                  KOEC:
     KOER:                                    CB:
Equipment/Procedure Used       Effective? Equipment/Procedure Used      Effective?

------------------------- SERVICE ACTIONS --------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

---------------------- VEHICLE DETAILS --------------------------
Vehicle Build Date:              10/20/1997      Warranty Start Date:        01/05/1998
Date of Sale:                    01/05/1998      Selling Dlr (Mkt,Dlr,Sub):   01686
Dealer Special Order:                            Gross Vehicle Weight:
LH/RH Drive:
                                  - - - ENGINE - - -
Engine: 3.0L EFI                                  Tag: 8G            580 AA
Bld Dt:                Calb:   856FR05 A            Serial #:
                          - - - TRANSMISSION - - -
Trans: 4R44E 4SP AUTO                             Part #:
Bld Dt:                                            Serial #:
Model:                                Plt:                               Shft:
                                    - - - AXLE - - -
Axle:  2750# FORD 3.73 CONVE    Id Tag Code:                Bld Dt:
Serial #:                                                       Plt:
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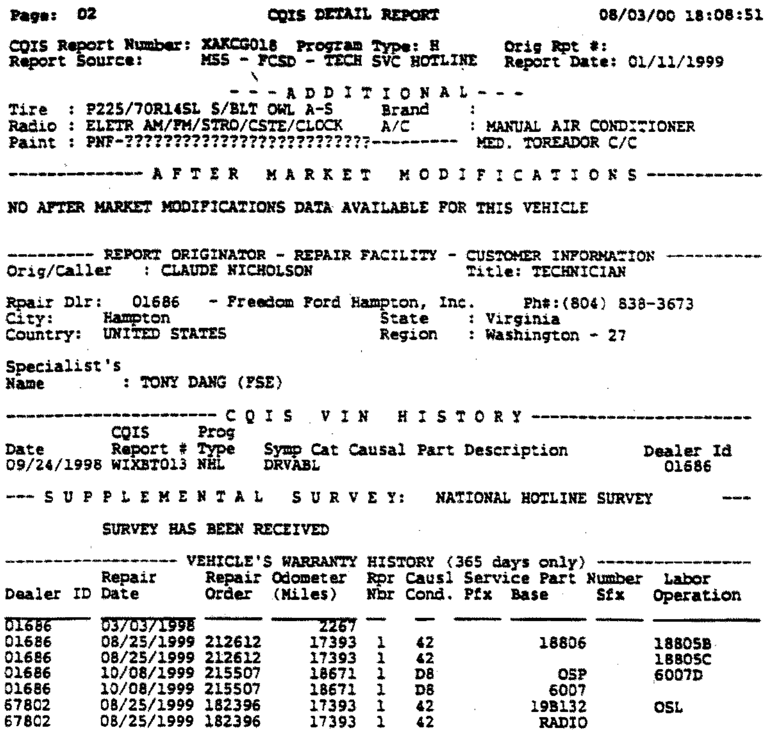
225/70R14SL

REDACTED



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Page:  02                       CQIS DETAIL REPORT                  08/03/00 18:08:51

CQIS Report Number: XAKCG018  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 01/11/1999
                             \
                         - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S     Brand     :
Radio : ELETR AM/FM/STRO/CSTE/CLOCK    A/C       : MANUAL AIR CONDITIONER
Paint : PNF-??????????????????????????---------  MED. TOREADOR C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : CLAUDE NICHOLSON                 Title: TECHNICIAN

Rpair Dlr:   01686   - Freedom Ford Hampton, Inc.     Ph#:(804) 838-3673
City:       Hampton                      State    : Virginia
Country:    UNITED STATES                Region   : Washington - 27

Specialist's
Name         : TONY DANG (FSE)

---------------------- C Q I S   V I N   H I S T O R Y -----------------------
              CQIS     Prog
Date          Report # Type   Symp Cat Causal Part Description         Dealer Id
09/24/1998 WIXBT013 NHL    DRVABL                                    01686

--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY        ---

           SURVEY HAS BEEN RECEIVED

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
           Repair       Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID  Date         Order  (Miles)   Nbr Cond. Pfx  Base    Sfx   Operation
_________  __________  ______ ________  ___  ___  _____ _______ _____ __________
01686      03/03/1998              2267
01686      08/25/1999 212612     17393   1   42            18806       18805B
01686      08/25/1999 212612     17393   1   42                        18805C
01686      10/08/1999 215507     18671   1   D8              05P       6007D
01686      10/08/1999 215507     18671   1   D8             6007
67802      08/25/1999 182396     17393   1   42           19B132       OSL
67802      08/25/1999 182396     17393   1   42            RADIO
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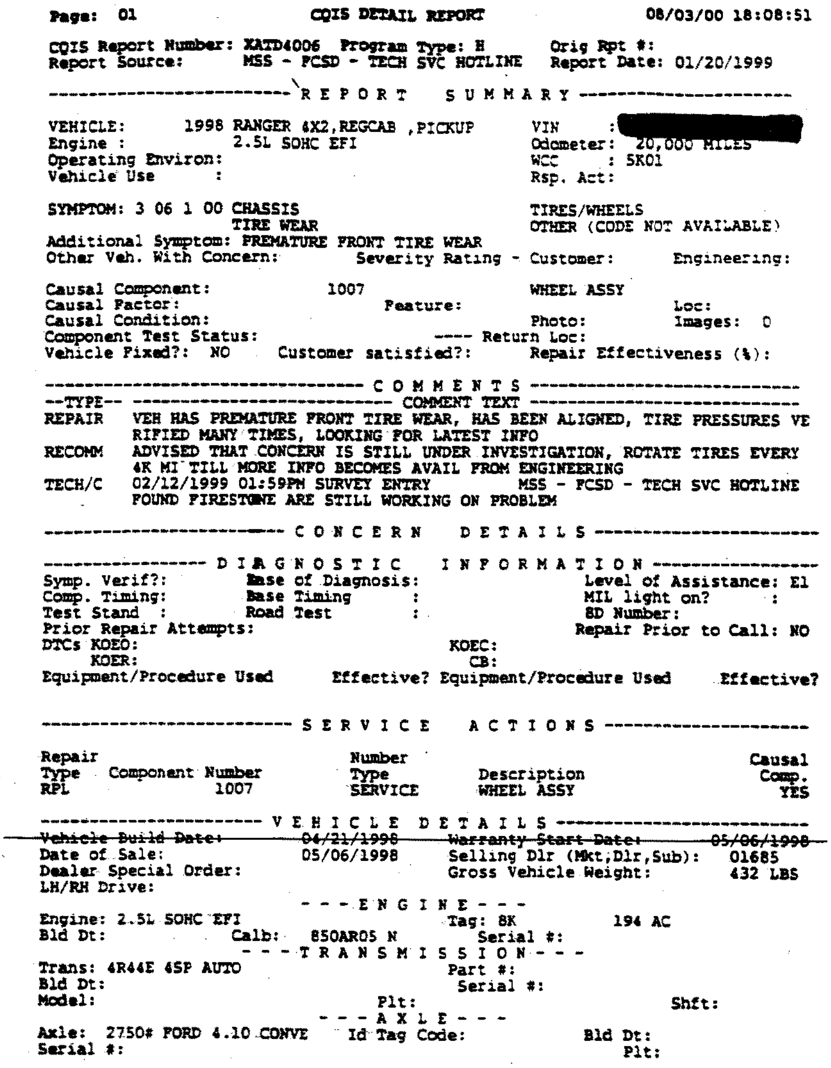


Page: 01 **CQIS DETAIL REPORT** 08/03/00 18:08:51

CQIS Report Number: XATD4006 Program Type: H Orig Rpt #:
Report Source: MSS - FCSD - TECH SVC HOTLINE Report Date: 01/20/1999

------------------------- R E P O R T   S U M M A R Y ----------------------

VEHICLE: 1998 RANGER 4X2,REGCAB ,PICKUP VIN : [redacted]
Engine : 2.5L SOHC EFI Odometer: 20,000 MILES
Operating Environ: WCC : 5K01
Vehicle Use : Rsp. Act:

SYMPTOM: 3 06 1 00 CHASSIS TIRES/WHEELS
TIRE WEAR OTHER (CODE NOT AVAILABLE)
Additional Symptom: PREMATURE FRONT TIRE WEAR
Other Veh. With Concern: Severity Rating - Customer: Engineering:

Causal Component: 1007 WHEEL ASSY
Causal Factor: Feature: Loc:
Causal Condition: Photo: Images: 0
Component Test Status: ---- Return Loc:
Vehicle Fixed?: NO Customer satisfied?: Repair Effectiveness (%):

-------------------------------- C O M M E N T S ---------------------------
--TYPE-- --------------------------- COMMENT TEXT ---------------------------
REPAIR VEH HAS PREMATURE FRONT TIRE WEAR, HAS BEEN ALIGNED, TIRE PRESSURES VERIFIED MANY TIMES, LOOKING FOR LATEST INFO
RECOMM ADVISED THAT CONCERN IS STILL UNDER INVESTIGATION, ROTATE TIRES EVERY 4K MI TILL MORE INFO BECOMES AVAIL FROM ENGINEERING
TECH/C 02/12/1999 01:59PM SURVEY ENTRY MSS - FCSD - TECH SVC HOTLINE
FOUND FIRESTONE ARE STILL WORKING ON PROBLEM

------------------------- C O N C E R N   D E T A I L S ----------------------

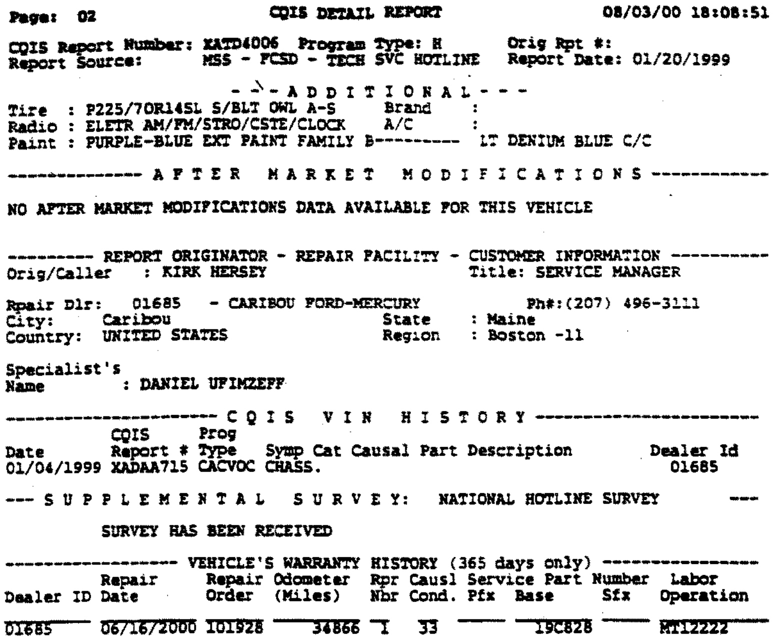
----------------- D I A G N O S T I C   I N F O R M A T I O N ----------------
Symp. Verif?: Ease of Diagnosis: Level of Assistance: E1
Comp. Timing: Base Timing : MIL light on? :
Test Stand : Road Test : 8D Number:
Prior Repair Attempts: Repair Prior to Call: NO
DTCs KOEO: KOEC:
KOER: CB:
Equipment/Procedure Used Effective? Equipment/Procedure Used Effective?

-------------------------- S E R V I C E   A C T I O N S ---------------------

Repair Type	Component Number	Number Type	Description	Causal Comp.
RPL	1007	SERVICE	WHEEL ASSY	YES

---------------------- V E H I C L E   D E T A I L S ------------------------
~~Vehicle Build Date: 04/21/1998 Warranty Start Date: 05/06/1998~~
Date of Sale: 05/06/1998 Selling Dlr (Mkt,Dlr,Sub): 01685
Dealer Special Order: Gross Vehicle Weight: 432 LBS
LH/RH Drive:
- - - E N G I N E - - -
Engine: 2.5L SOHC EFI Tag: 8K 194 AC
Bld Dt: Calb: 850AR05 N Serial #:
- - - T R A N S M I S S I O N - - -
Trans: 4R44E 4SP AUTO Part #:
Bld Dt: Serial #:
Model: Plt: Shft:
- - - A X L E - - -
Axle: 2750# FORD 4.10 CONVE Id Tag Code: Bld Dt:
Serial #: Plt:

70 R 145 C **REDACTED**



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Page: 02                    CQIS DETAIL REPORT                 08/03/00 18:08:51

CQIS Report Number: XATD4006  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 01/20/1999

                        - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S     Brand    :
Radio : ELETR AM/FM/STRO/CSTE/CLOCK    A/C      :
Paint : PURPLE-BLUE EXT PAINT FAMILY B---------  LT DENIUM BLUE C/C

--------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : KIRK HERSEY                     Title: SERVICE MANAGER

Rpair Dlr:   01685   - CARIBOU FORD-MERCURY           Ph#:(207) 496-3111
City:      Caribou                        State    : Maine
Country:   UNITED STATES                  Region   : Boston -11

Specialist's
Name          : DANIEL UFIMZEFF

---------------------- C Q I S   V I N   H I S T O R Y -----------------------
              CQIS      Prog
Date          Report # Type   Symp Cat Causal Part Description        Dealer Id
01/04/1999 XADAA715 CACVOC CHASS.                                        01685

--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY       ---

           SURVEY HAS BEEN RECEIVED

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
            Repair      Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID Date          Order  (Miles)   Nbr Cond. Pfx  Base     Sfx   Operation

01685     06/16/2000 101928      34866   1    33         19C828         MT12222
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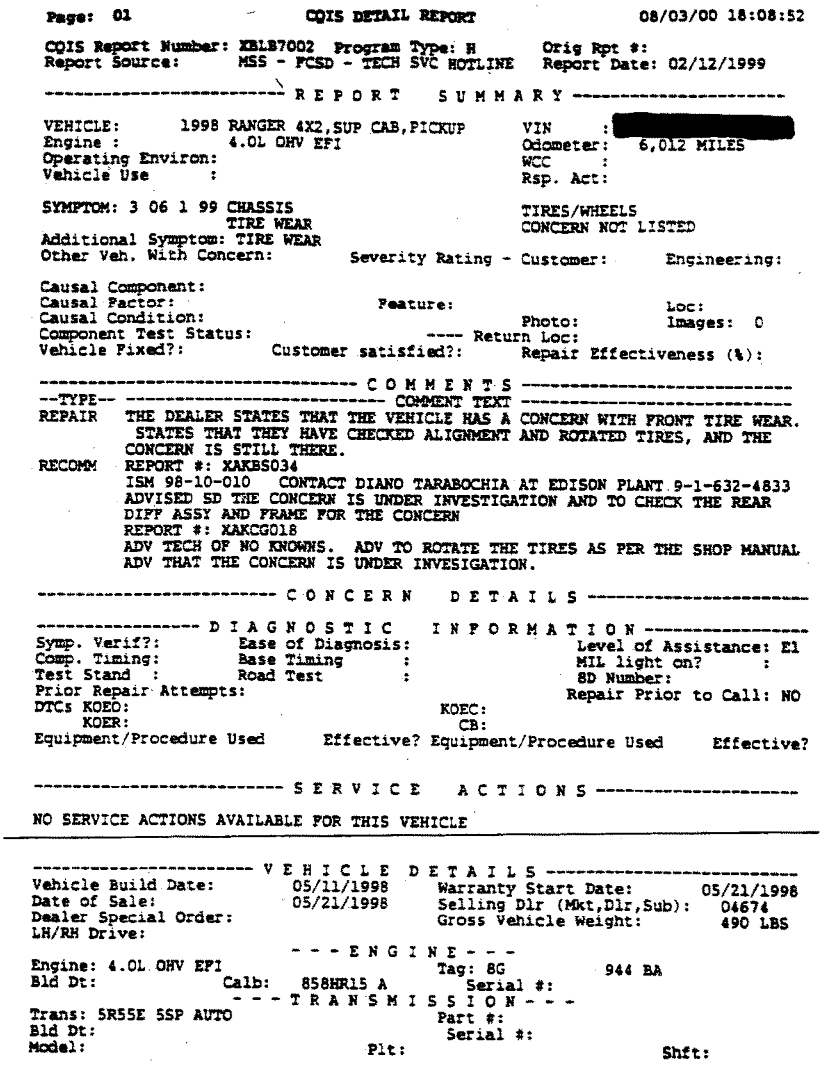

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Page: 01                  CQIS DETAIL REPORT                 08/03/00 18:08:52

CQIS Report Number: XBLB7002  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 02/12/1999

------------------------ R E P O R T   S U M M A R Y ----------------------

VEHICLE:       1998 RANGER 4X2,SUP CAB,PICKUP      VIN      : [redacted]
Engine :            4.0L OHV EFI                    Odometer:   6,012 MILES
Operating Environ:                                  WCC      :
Vehicle Use       :                                 Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                          TIRES/WHEELS
                   TIRE WEAR                        CONCERN NOT LISTED
Additional Symptom: TIRE WEAR
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                       Feature:                    Loc:
Causal Condition:                                   Photo:       Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:         Customer satisfied?:        Repair Effectiveness (%):

------------------------------- C O M M E N T S ---------------------------
--TYPE-- ------------------------- COMMENT TEXT ---------------------------
REPAIR   THE DEALER STATES THAT THE VEHICLE HAS A CONCERN WITH FRONT TIRE WEAR.
          STATES THAT THEY HAVE CHECKED ALIGNMENT AND ROTATED TIRES, AND THE
         CONCERN IS STILL THERE.
RECOMM   REPORT #: XAKBS034
         ISM 98-10-010   CONTACT DIANO TARABOCHIA AT EDISON PLANT 9-1-632-4833
         ADVISED SD THE CONCERN IS UNDER INVESTIGATION AND TO CHECK THE REAR
         DIFF ASSY AND FRAME FOR THE CONCERN
         REPORT #: XAKCG018
         ADV TECH OF NO KNOWNS.  ADV TO ROTATE THE TIRES AS PER THE SHOP MANUAL
         ADV THAT THE CONCERN IS UNDER INVESIGATION.

------------------------ C O N C E R N   D E T A I L S --------------------

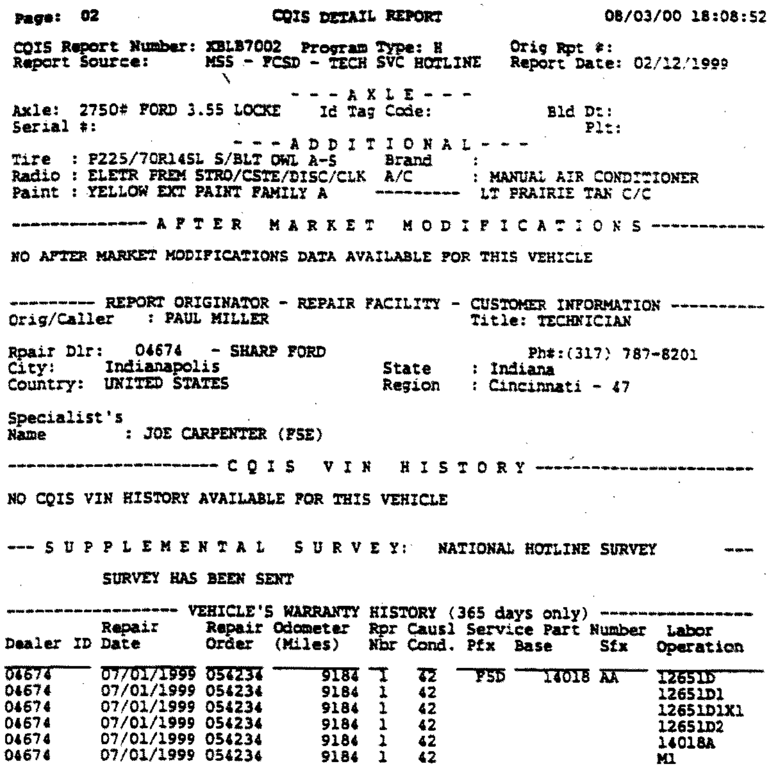
---------------- D I A G N O S T I C   I N F O R M A T I O N -------------
Symp. Verif?:        Ease of Diagnosis:                  Level of Assistance: E1
Comp. Timing:        Base Timing        :                MIL light on?       :
Test Stand  :        Road Test          :                8D Number:
Prior Repair Attempts:                                  Repair Prior to Call: NO
DTCs KOEO:                                  KOEC:
     KOER:                                    CB:
Equipment/Procedure Used       Effective? Equipment/Procedure Used      Effective?

------------------------ S E R V I C E   A C T I O N S --------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

----------------------- V E H I C L E  D E T A I L S ---------------------
Vehicle Build Date:          05/11/1998   Warranty Start Date:           05/21/1998
Date of Sale:                05/21/1998   Selling Dlr (Mkt,Dlr,Sub):   04674
Dealer Special Order:                     Gross Vehicle Weight:         490 LBS
LH/RH Drive:
                            - - - E N G I N E - - -
Engine: 4.0L OHV EFI                      Tag: 8G            944 BA
Bld Dt:               Calb:   858HR15 A     Serial #:
                         - - - T R A N S M I S S I O N - - -
Trans: 5R55E 5SP AUTO                     Part #:
Bld Dt:                                    Serial #:
Model:                         Plt:                          Shft:
```

REDACTED



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Page: 02                   CQIS DETAIL REPORT                08/03/00 18:08:52

CQIS Report Number: XBLB7002  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 02/12/1999
                    \
                               - - - A X L E - - -
Axle:  2750# FORD 3.55 LOCKE    Id Tag Code:            Bld Dt:
Serial #:                                                  Plt:
                         - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S     Brand     :
Radio : ELETR PREM STRO/CSTE/DISC/CLK  A/C       : MANUAL AIR CONDITIONER
Paint : YELLOW EXT PAINT FAMILY A     ---------  LT PRAIRIE TAN C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : PAUL MILLER                        Title: TECHNICIAN

Rpair Dlr:   04674   - SHARP FORD                        Ph#:(317) 787-8201
City:      Indianapolis                  State    : Indiana
Country:   UNITED STATES                 Region   : Cincinnati - 47

Specialist's
Name          : JOE CARPENTER (FSE)

---------------------- C Q I S   V I N   H I S T O R Y -----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY        ---

         SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
          Repair     Repair Odometer Rpr Causl Service Part Number  Labor
Dealer ID Date       Order  (Miles)  Nbr Cond. Pfx  Base     Sfx   Operation
--------- ---------- ------ -------- --- ----- ---- -------- ---   ---------
04674     07/01/1999 054234     9184  1    42   F5D    14018 AA    12651D
04674     07/01/1999 054234     9184  1    42                      12651D1
04674     07/01/1999 054234     9184  1    42                      12651D1X1
04674     07/01/1999 054234     9184  1    42                      12651D2
04674     07/01/1999 054234     9184  1    42                      14018A
04674     07/01/1999 054234     9184  1    42                      M1
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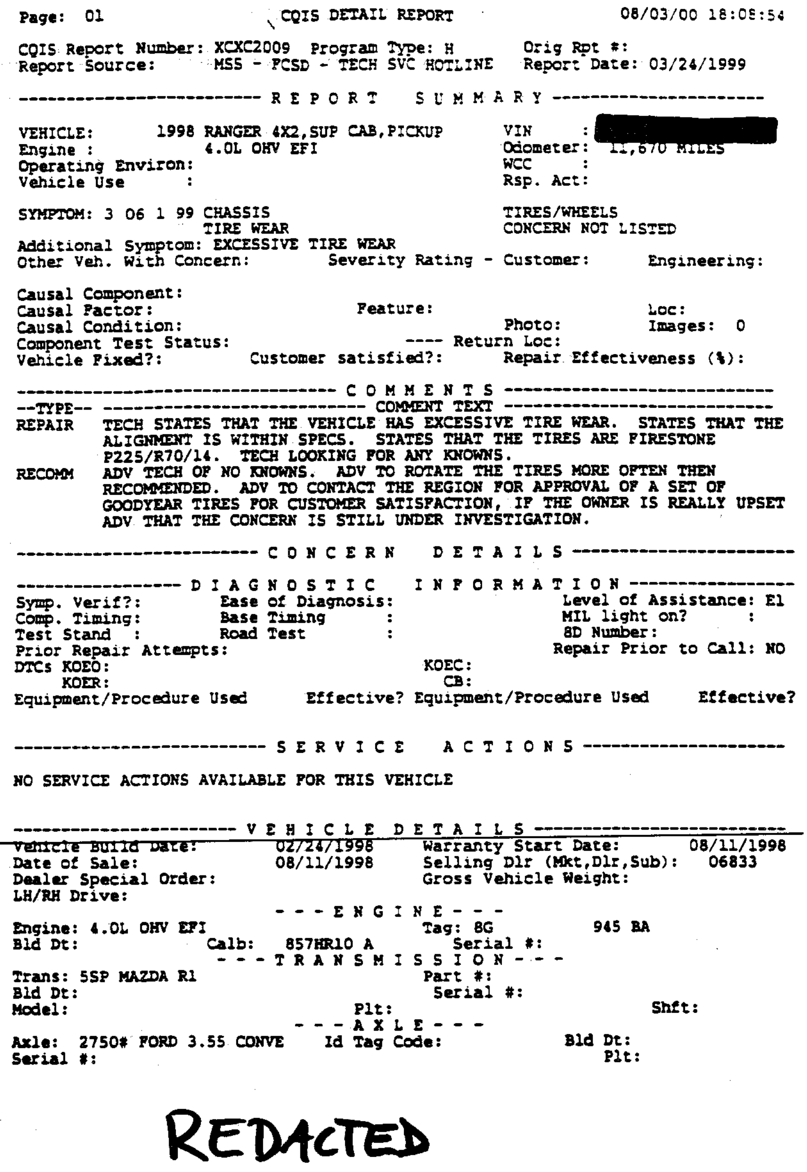

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Page: 01                  CQIS DETAIL REPORT                   08/03/00 18:09:54

CQIS Report Number: XCXC2009  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 03/24/1999

------------------------- R E P O R T   S U M M A R Y ----------------------

VEHICLE:       1998 RANGER 4X2,SUP CAB,PICKUP       VIN      : [redacted]
Engine :            4.0L OHV EFI                    Odometer: 11,670 MILES
Operating Environ:                                  WCC      :
Vehicle Use      :                                  Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                          TIRES/WHEELS
                   TIRE WEAR                        CONCERN NOT LISTED
Additional Symptom: EXCESSIVE TIRE WEAR
Other Veh. With Concern:       Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                      Feature:                        Loc:
Causal Condition:                                   Photo:          Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:        Customer satisfied?:         Repair Effectiveness (%):

---------------------------------- C O M M E N T S ----------------------------
--TYPE-- ---------------------------- COMMENT TEXT ----------------------------
REPAIR   TECH STATES THAT THE VEHICLE HAS EXCESSIVE TIRE WEAR.  STATES THAT THE
         ALIGNMENT IS WITHIN SPECS.  STATES THAT THE TIRES ARE FIRESTONE
         P225/R70/14.  TECH LOOKING FOR ANY KNOWNS.
RECOMM   ADV TECH OF NO KNOWNS.  ADV TO ROTATE THE TIRES MORE OFTEN THEN
         RECOMMENDED.  ADV TO CONTACT THE REGION FOR APPROVAL OF A SET OF
         GOODYEAR TIRES FOR CUSTOMER SATISFACTION, IF THE OWNER IS REALLY UPSET
         ADV THAT THE CONCERN IS STILL UNDER INVESTIGATION.

------------------------- C O N C E R N   D E T A I L S ----------------------

----------------- D I A G N O S T I C   I N F O R M A T I O N ----------------
Symp. Verif?:        Ease of Diagnosis:                 Level of Assistance: E1
Comp. Timing:        Base Timing     :                  MIL light on?       :
Test Stand  :        Road Test       :                  8D Number:
Prior Repair Attempts:                                 Repair Prior to Call: NO
DTCs KOEO:                                 KOEC:
     KOER:                                   CB:
Equipment/Procedure Used        Effective? Equipment/Procedure Used     Effective?

-------------------------- S E R V I C E   A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

----------------------- V E H I C L E   D E T A I L S ------------------------
Vehicle Build Date:        02/24/1998      Warranty Start Date:        08/11/1998
Date of Sale:              08/11/1998      Selling Dlr (Mkt,Dlr,Sub):  06833
Dealer Special Order:                      Gross Vehicle Weight:
LH/RH Drive:
                              - - - E N G I N E - - -
Engine: 4.0L OHV EFI                       Tag: 8G          945 BA
Bld Dt:              Calb:    857HR10 A       Serial #:
                         - - - T R A N S M I S S I O N - - -
Trans: 5SP MAZDA R1                        Part #:
Bld Dt:                                       Serial #:
Model:                              Plt:                             Shft:
                                 - - - A X L E - - -
Axle:  2750# FORD 3.55 CONVE     Id Tag Code:           Bld Dt:
Serial #:                                                   Plt:
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REDACTED

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Page:  02                  \ CQIS DETAIL REPORT  .            08/03/00 18:08:54

CQIS Report Number: XCXC2009  Program Type: H      Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE  Report Date: 03/24/1999

                       - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S     Brand    :
Radio : ELETR  AM/FM STRO/DISC/CLK     A/C      : MANUAL AIR CONDITIONER
Paint : GREEN-YELLOW EXT PAINT FAMILY ---------  EBONY SOLID C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller   : DONNY GRAMBLIN                  Title: TECHNICIAN

Rpair Dlr:   02897   - TRI MOTOR SALES INC            Ph#:(419) 898-2931
City:     Oak Harbor                   State    : Ohio
Country:  UNITED STATES                Region   : Detroit - 48

Specialist's
Name        : TONY DANG (FSE)
---------------------- C Q I S   V I N   H I S T O R Y ----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY        ---

          SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
          Repair     Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID Date       Order  (Miles)   Nbr Cond. Pfx  Base     Sfx   Operation

02986     10/25/1999 472584     35025  I         F87    9A825 LA    99509B
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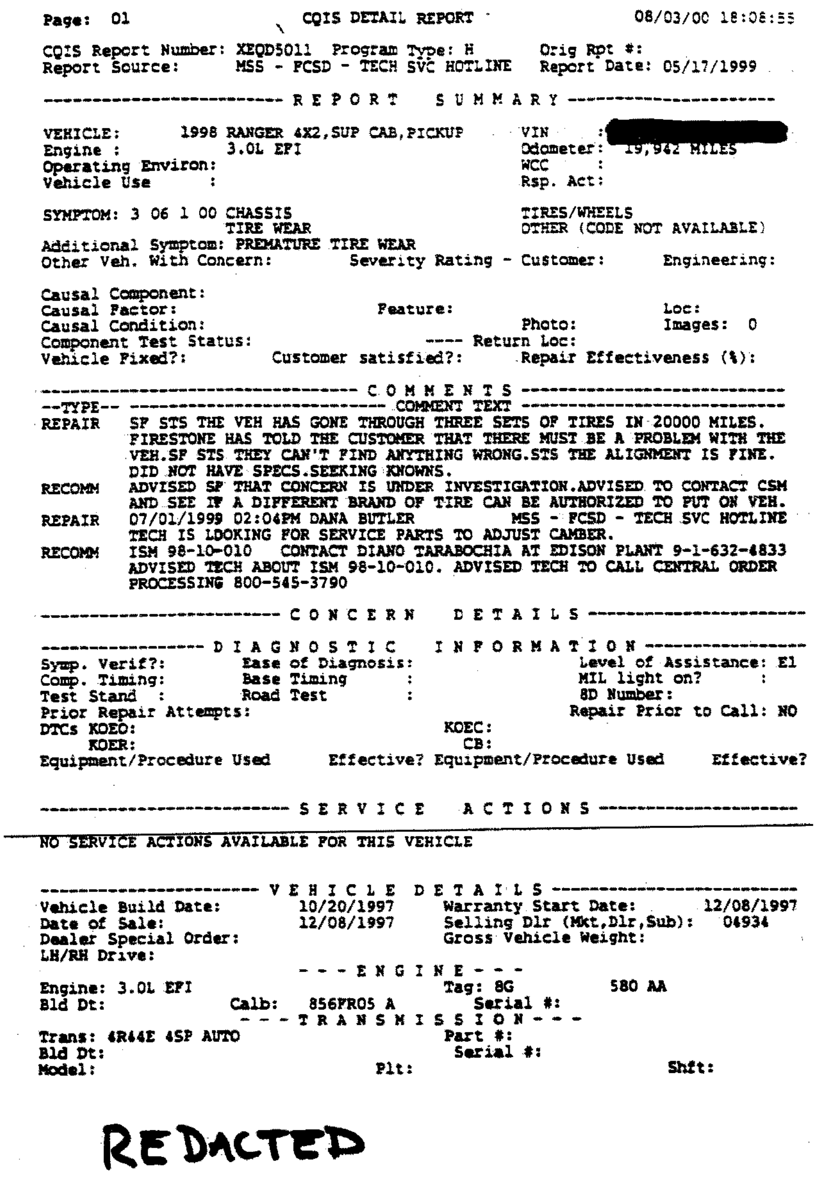

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Page:  01              \  CQIS DETAIL REPORT              08/03/00 18:08:55

CQIS Report Number: XEQD5011  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 05/17/1999

-------------------------- R E P O R T   S U M M A R Y ----------------------

VEHICLE:       1998 RANGER 4X2,SUP CAB,PICKUP       VIN       :[redacted]
Engine :             3.0L EFI                       Odometer:  19,942 MILES
Operating Environ:                                  WCC       :
Vehicle Use       :                                 Rsp. Act:

SYMPTOM: 3 06 1 00 CHASSIS                          TIRES/WHEELS
                   TIRE WEAR                        OTHER (CODE NOT AVAILABLE)
Additional Symptom: PREMATURE TIRE WEAR
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                    Feature:                       Loc:
Causal Condition:                                   Photo:         Images:  0
Component Test Status:                  ---- Return Loc:
Vehicle Fixed?:        Customer satisfied?:     Repair Effectiveness (%):

---------------------------------- C O M M E N T S ---------------------------
--TYPE-- ------------------------------ COMMENT TEXT --------------------------
REPAIR   SF STS THE VEH HAS GONE THROUGH THREE SETS OF TIRES IN 20000 MILES.
         FIRESTONE HAS TOLD THE CUSTOMER THAT THERE MUST BE A PROBLEM WITH THE
         VEH.SF STS THEY CAN'T FIND ANYTHING WRONG.STS THE ALIGNMENT IS FINE.
         DID NOT HAVE SPECS.SEEKING KNOWNS.
RECOMM   ADVISED SF THAT CONCERN IS UNDER INVESTIGATION.ADVISED TO CONTACT CSM
         AND SEE IF A DIFFERENT BRAND OF TIRE CAN BE AUTHORIZED TO PUT ON VEH.
REPAIR   07/01/1999 02:04PM DANA BUTLER           MSS - FCSD - TECH SVC HOTLINE
         TECH IS LOOKING FOR SERVICE PARTS TO ADJUST CAMBER.
RECOMM   ISM 98-10-010   CONTACT DIANO TARABOCHIA AT EDISON PLANT 9-1-632-4833
         ADVISED TECH ABOUT ISM 98-10-010. ADVISED TECH TO CALL CENTRAL ORDER
         PROCESSING 800-545-3790

------------------------- C O N C E R N   D E T A I L S -----------------------

----------------- D I A G N O S T I C   I N F O R M A T I O N -----------------
Symp. Verif?:        Ease of Diagnosis:                 Level of Assistance: E1
Comp. Timing:        Base Timing       :                MIL light on?       :
Test Stand   :       Road Test         :                8D Number:
Prior Repair Attempts:                                 Repair Prior to Call: NO
DTCs KOEO:                                KOEC:
     KOER:                                  CB:
Equipment/Procedure Used       Effective? Equipment/Procedure Used     Effective?

-------------------------- S E R V I C E   A C T I O N S ----------------------
NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

----------------------- V E H I C L E   D E T A I L S -------------------------
Vehicle Build Date:          10/20/1997   Warranty Start Date:        12/08/1997
Date of Sale:                12/08/1997   Selling Dlr (Mkt,Dlr,Sub):   04934
Dealer Special Order:                     Gross Vehicle Weight:
LH/RH Drive:
                             - - - E N G I N E - - -
Engine: 3.0L EFI                          Tag: 8G           580 AA
Bld Dt:               Calb:   856FR05 A      Serial #:
                          - - - T R A N S M I S S I O N - - -
Trans: 4R44E 4SP AUTO                     Part #:
Bld Dt:                                     Serial #:
Model:                          Plt:                              Shft:
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Page:  02                  CQIS DETAIL REPORT                08/03/00 18:08:55

CQIS Report Number: XEQD5011  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 05/17/1999

                              - - - A X L E - - -
Axle:  2750# FORD 3.73 CONVE    Id Tag Code:             Bld Dt:
Serial #:                                                     Plt:
                         - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S     Brand     :
Radio : ELETR AM/FM/STRO/CSTE/CLOCK    A/C       : MANUAL AIR CONDITIONER
Paint : NEUTRAL EXT PAINT FAMILY A     ---------  MED PLATINUM C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : ROCKY CIFALIA                    Title: SHOP FOREMAN

Rpair Dlr:    04999   - Ernie Haire Ford Inc            Ph#:(813) 930-6400
City:       Tampa                         State     : Florida
Country:  UNITED STATES                   Region    : Orlando - 24

Specialist's
Name          : ROBERT BLOOM

---------------------- C Q I S   V I N   H I S T O R Y -----------------------
             CQIS      Prog
Date         Report # Type   Symp Cat Causal Part Description         Dealer Id
07/01/1999 XGAC3009 NHL    DRVABL                                        04999

--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY       ---

           SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
           Repair       Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID Date         Order  (Miles)   Nbr Cond. Pfx   Base     Sfx   Operation

_________ ___________ _______ __________ __   __  _____ ________ _____ __________
04934     12/03/1997                   5
04977     12/31/1997                1246
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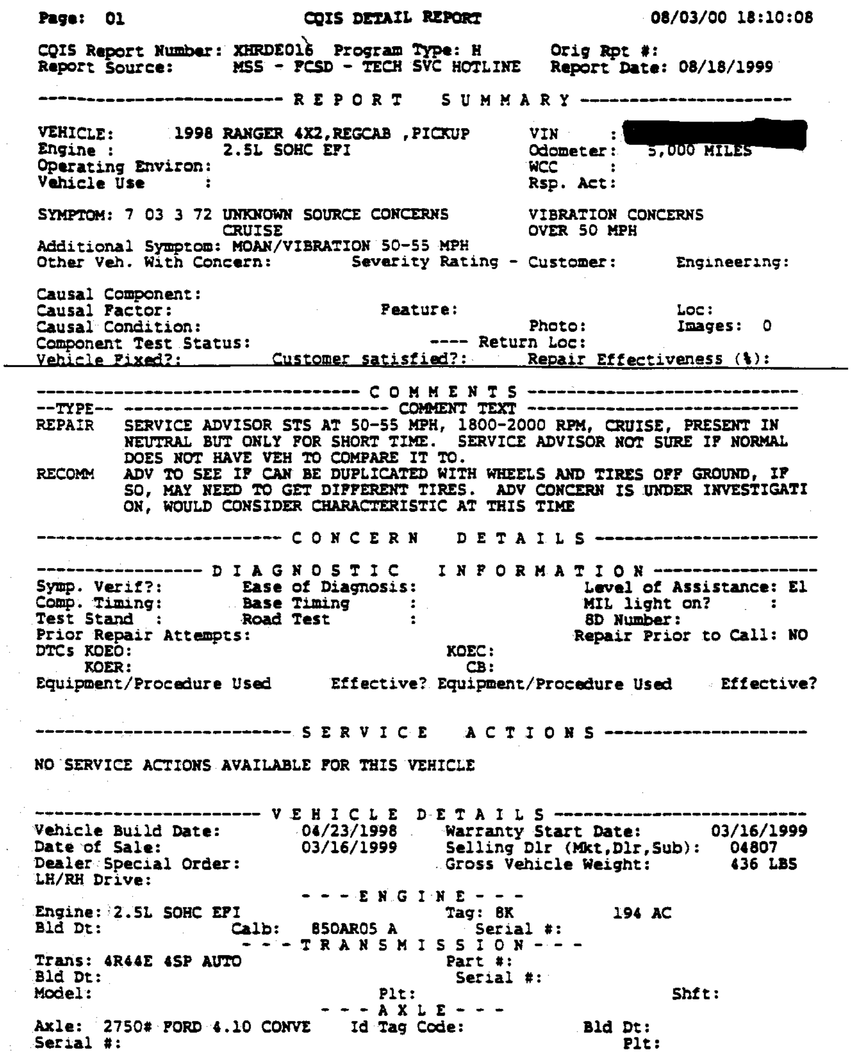

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Page:  01                    CQIS DETAIL REPORT                08/03/00 18:10:08

CQIS Report Number: XHRDE016  Program Type: H         Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE     Report Date: 08/18/1999

-------------------------- R E P O R T   S U M M A R Y ----------------------

VEHICLE:        1998 RANGER 4X2,REGCAB ,PICKUP         VIN      : [redacted]
Engine :             2.5L SOHC EFI                     Odometer:   5,000 MILES
Operating Environ:                                     WCC      :
Vehicle Use       :                                    Rsp. Act:

SYMPTOM: 7 03 3 72 UNKNOWN SOURCE CONCERNS             VIBRATION CONCERNS
                   CRUISE                              OVER 50 MPH
Additional Symptom: MOAN/VIBRATION 50-55 MPH
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                       Feature:                     Loc:
Causal Condition:                                   Photo:        Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:          Customer satisfied?:       Repair Effectiveness (%):

---------------------------------- C O M M E N T S -----------------------------
--TYPE-- ---------------------------- COMMENT TEXT -----------------------------
REPAIR   SERVICE ADVISOR STS AT 50-55 MPH, 1800-2000 RPM, CRUISE, PRESENT IN
         NEUTRAL BUT ONLY FOR SHORT TIME.  SERVICE ADVISOR NOT SURE IF NORMAL
         DOES NOT HAVE VEH TO COMPARE IT TO.
RECOMM   ADV TO SEE IF CAN BE DUPLICATED WITH WHEELS AND TIRES OFF GROUND, IF
         SO, MAY NEED TO GET DIFFERENT TIRES.  ADV CONCERN IS UNDER INVESTIGATI
         ON, WOULD CONSIDER CHARACTERISTIC AT THIS TIME

-------------------------- C O N C E R N   D E T A I L S -----------------------

------------------ D I A G N O S T I C   I N F O R M A T I O N -----------------
Symp. Verif?:        Ease of Diagnosis:                 Level of Assistance: E1
Comp. Timing:        Base Timing      :                 MIL light on?      :
Test Stand  :        Road Test        :                 8D Number:
Prior Repair Attempts:                                 Repair Prior to Call: NO
DTCs KOEO:                               KOEC:
    KOER:                                  CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used      Effective?

--------------------------- S E R V I C E   A C T I O N S ----------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE


------------------------ V E H I C L E   D E T A I L S -------------------------
Vehicle Build Date:         04/23/1998    Warranty Start Date:        03/16/1999
Date of Sale:               03/16/1999    Selling Dlr (Mkt,Dlr,Sub):   04807
Dealer Special Order:                     Gross Vehicle Weight:        436 LBS
LH/RH Drive:
                            - - - E N G I N E - - -
Engine: 2.5L SOHC EFI                     Tag: 8K         194 AC
Bld Dt:             Calb:   850AR05 A        Serial #:
                     - - - T R A N S M I S S I O N - - -
Trans: 4R44E 4SP AUTO                     Part #:
Bld Dt:                                    Serial #:
Model:                           Plt:                              Shft:
                              - - - A X L E - - -
Axle:  2750# FORD 4.10 CONVE      Id Tag Code:            Bld Dt:
Serial #:                                                       Plt:
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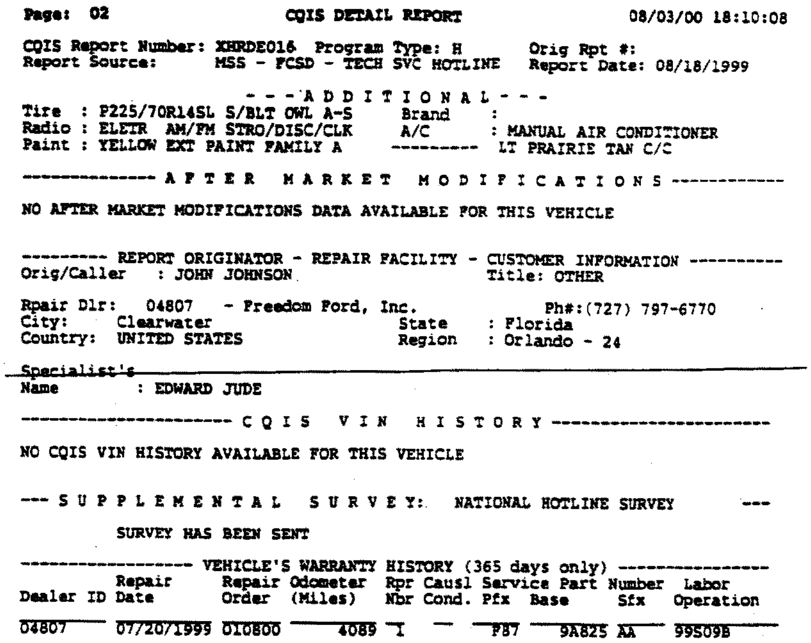
REDACTED



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Page:  02                    CQIS DETAIL REPORT                  08/03/00 18:10:08

CQIS Report Number: XHRDE016  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 08/18/1999

                       - - - A D D I T I O N A L - - -
Tire  : P225/70R14SL S/BLT OWL A-S      Brand    :
Radio : ELETR  AM/FM STRO/DISC/CLK      A/C      : MANUAL AIR CONDITIONER
Paint : YELLOW EXT PAINT FAMILY A     ---------  LT PRAIRIE TAN C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller   : JOHN JOHNSON                       Title: OTHER

Rpair Dlr:   04807   - Freedom Ford, Inc.              Ph#:(727) 797-6770
City:       Clearwater                      State    : Florida
Country:    UNITED STATES                   Region   : Orlando - 24

Specialist's
Name         : EDWARD JUDE

---------------------- C Q I S   V I N   H I S T O R Y ----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY       ---

         SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
          Repair      Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID Date        Order  (Miles)   Nbr Cond. Pfx  Base     Sfx  Operation

04807     07/20/1999  010800      4089  1          FB7     9A825  AA   99509B
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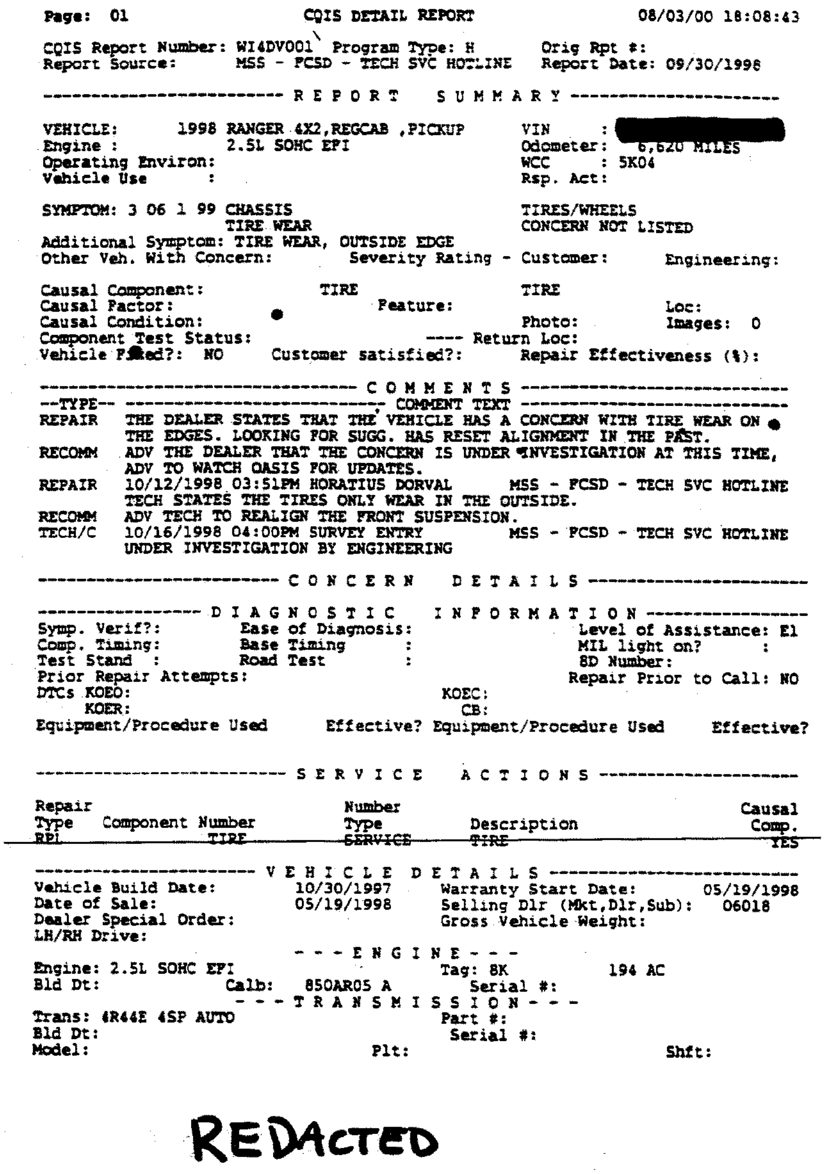

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Page:  01                    CQIS DETAIL REPORT                08/03/00 18:08:43

CQIS Report Number: WI4DV001  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 09/30/1998

------------------------ R E P O R T   S U M M A R Y ----------------------

VEHICLE:       1998 RANGER 4X2,REGCAB ,PICKUP       VIN       : [redacted]
Engine :            2.5L SOHC EFI                   Odometer:    6,620 MILES
Operating Environ:                                  WCC       : 5K04
Vehicle Use        :                                Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                          TIRES/WHEELS
                   TIRE WEAR                        CONCERN NOT LISTED
Additional Symptom: TIRE WEAR, OUTSIDE EDGE
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:             TIRE                  TIRE
Causal Factor:                       Feature:                    Loc:
Causal Condition:                                   Photo:       Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:  NO     Customer satisfied?:        Repair Effectiveness (%):

-------------------------------- C O M M E N T S --------------------------
--TYPE-- -------------------------- COMMENT TEXT ---------------------------
REPAIR   THE DEALER STATES THAT THE VEHICLE HAS A CONCERN WITH TIRE WEAR ON
         THE EDGES. LOOKING FOR SUGG. HAS RESET ALIGNMENT IN THE PAST.
RECOMM   ADV THE DEALER THAT THE CONCERN IS UNDER INVESTIGATION AT THIS TIME,
         ADV TO WATCH OASIS FOR UPDATES.
REPAIR   10/12/1998 03:51PM HORATIUS DORVAL       MSS - FCSD - TECH SVC HOTLINE
         TECH STATES THE TIRES ONLY WEAR IN THE OUTSIDE.
RECOMM   ADV TECH TO REALIGN THE FRONT SUSPENSION.
TECH/C   10/16/1998 04:00PM SURVEY ENTRY          MSS - FCSD - TECH SVC HOTLINE
         UNDER INVESTIGATION BY ENGINEERING

------------------------ C O N C E R N   D E T A I L S ----------------------

---------------- D I A G N O S T I C   I N F O R M A T I O N ----------------
Symp. Verif?:         Ease of Diagnosis:               Level of Assistance: E1
Comp. Timing:         Base Timing      :               MIL light on?       :
Test Stand  :         Road Test        :               8D Number:
Prior Repair Attempts:                                Repair Prior to Call: NO
DTCs KOEO:                                 KOEC:
     KOER:                                   CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used     Effective?

------------------------ S E R V I C E   A C T I O N S ----------------------

Repair                           Number                                 Causal
Type    Component Number         Type         Description                Comp.
~~RPL              TIRE          SERVICE      TIRE                        YES~~

---------------------- V E H I C L E   D E T A I L S -----------------------
Vehicle Build Date:          10/30/1997    Warranty Start Date:       05/19/1998
Date of Sale:                05/19/1998    Selling Dlr (Mkt,Dlr,Sub):   06018
Dealer Special Order:                      Gross Vehicle Weight:
LH/RH Drive:
                              - - - E N G I N E - - -
Engine: 2.5L SOHC EFI                      Tag: 8K           194 AC
Bld Dt:              Calb:   850AR05 A       Serial #:
                       - - - T R A N S M I S S I O N - - -
Trans: 4R44E 4SP AUTO                      Part #:
Bld Dt:                                      Serial #:
Model:                           Plt:                               Shft:
```

REDACTED

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Page:  02                   CQIS DETAIL REPORT                 08/03/00 18:08:43

CQIS Report Number: WI4DV001  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 09/30/1998

                                - - - A X L E - - -
Axle:  2750# FORD 4.10 CONVE    Id Tag Code:              Bld Dt:
Serial #:                                                    Plt:
                           - - - A D D I T I O N A L - - -
Tire  : P225/70R15 SL ST BELT OWL A-S  Brand      :
Radio : ELETR  AM/FM STRO/DISC/CLK     A/C        : MANUAL AIR CONDITIONER
Paint : NEUTRAL EXT PAINT FAMILY A    ---------  OXFORD WHITE SOLID C/C

------------- A F T E R   M A R K E T   M O D I F I C A T I O N S -----------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ---------
Orig/Caller    : JACK JOHNSON                     Title: SERVICE MANAGER

Rpair Dlr:   06018   - Crawford County Ford, Inc.     Ph#:(501) 474-8068
City:      Van Buren                      State     : Arkansas
Country:   UNITED STATES                  Region    : Memphis - 23

Specialist's
Name          : JOE CARPENTER (FSE)

---------------------- C Q I S   V I N   H I S T O R Y ----------------------
            CQIS      Prog
Date        Report #  Type    Symp Cat Causal Part Description         Dealer Id
10/02/1998 WJBAA231  EDSR    CHASS.                                      06018
03/08/1999 XCHBV005  NHL     CHASS.                                      06018
04/17/2000 YDQAB479  CACVOC  CHASS.                                      06018
04/17/2000 YDQAB677  CACVOC  CHASS.                                      05875

--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY       ---

           SURVEY HAS BEEN RECEIVED

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
           Repair       Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID  Date         Order  (Miles)   Nbr Cond. Pfx   Base      Sfx  Operation
---------  ----------   ------ --------  --- ----  ----  -------   ---  ----------
12064      04/26/2000 001326     33077  1   33           5421410        23943A
12064      04/26/2000 001326     33077  1   33                          23943A13
```

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Page: 01                    CQIS DETAIL REPORT                 08/03/00 18:08:44

CQIS Report Number: WJBAA245  Program Type: Q        Orig Rpt #:  224729-98
Report Source:          MSS - FCSD - QSFS            Report Date: 10/02/1998

------------------------- R E P O R T   S U M M A R Y ----------------------

VEHICLE:        1998 RANGER 4X2,REGCAB ,PICKUP       VIN      : [redacted]
Engine :             2.5L SOHC EFI                   Odometer:   6,761 MILES
Operating Environ:                                   WCC      : 5K
Vehicle Use      :                                   Rsp. Act:

SYMPTOM: 3 06 1 00 CHASSIS                           TIRES/WHEELS
                   TIRE WEAR                         OTHER (CODE NOT AVAILABLE)
Additional Symptom:
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                       Feature:                    Loc:
Causal Condition:                                    Photo:      Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:         Customer satisfied?:         Repair Effectiveness (%):

--------------------------------- C O M M E N T S ---------------------------
--TYPE-- --------------------------- COMMENT TEXT ---------------------------
CONCER   THE TIRES WERE WEARING ON THE OUTER EDGE.
REPAIR   THE CONCERN IS UNDER INVESTIGATION PER THE TECH HOTLINE. NOTE: THE
         VEHICLE HAS FIRESTONE TIRES.
AUDIT    10/06/1998 09:26AM DATA ENTRY5            MSS - FCSD - QSFS
         SYMPTOM     3 06 0 00        CHANGED TO 3 06 1 00        BY NBAKER6

------------------------- C O N C E R N   D E T A I L S ----------------------

---------------- D I A G N O S T I C   I N F O R M A T I O N ----------------
Symp. Verif?:        Ease of Diagnosis:                  Level of Assistance:
Comp. Timing:        Base Timing     :                   MIL light on?      :
Test Stand  :        Road Test       :                   8D Number:
Prior Repair Attempts:                                  Repair Prior to Call: NO
DTCs KOEO:                                 KOEC:
     KOER:                                  CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used     Effective?

-------------------------- S E R V I C E   A C T I O N S --------------------

Repair                             Number                                 Causal
Type    Component Number           Type        Description                 Comp.
NOA               FRONT            REPORTED    TIRES

----------------------- V E H I C L E   D E T A I L S -----------------------
Vehicle Build Date:        09/25/1997    Warranty Start Date:        04/13/1998
~~Date of Sale:              04/13/1998    Selling Dlr (Mkt,Dlr,Sub):~~   06018
Dealer Special Order:                    Gross Vehicle Weight:
LH/RH Drive:
                           - - - E N G I N E - - -
Engine: 2.5L SOHC EFI                    Tag: 8K          195 AB
Bld Dt:              Calb:   849AR06 A        Serial #:
                      - - - T R A N S M I S S I O N - - -
Trans: 5SP MAZDA R1                      Part #:
Bld Dt:                                   Serial #:
Model:                           Plt:                             Shft:
                             - - - A X L E - - -
Axle:  2750# FORD 3.73 CONVE    Id Tag Code:              Bld Dt:
Serial #:                                                    Plt:
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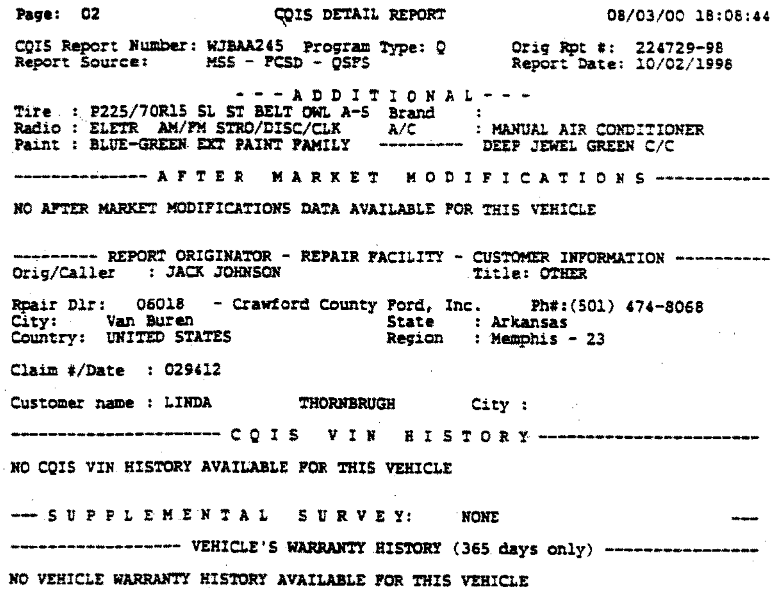

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Page:  02                 CQIS DETAIL REPORT                   08/03/00 18:08:44

CQIS Report Number: WJBAA245  Program Type: Q        Orig Rpt #:  224729-98
Report Source:      MSS - PCSD - QSFS                Report Date: 10/02/1998

                       - - - A D D I T I O N A L - - -
Tire  : P225/70R15 SL ST BELT OWL A-S  Brand    :
Radio : ELETR  AM/FM STRO/DISC/CLK     A/C      : MANUAL AIR CONDITIONER
Paint : BLUE-GREEN EXT PAINT FAMILY   ---------  DEEP JEWEL GREEN C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : JACK JOHNSON                       Title: OTHER

Rpair Dlr:   06018   - Crawford County Ford, Inc.     Ph#:(501) 474-8068
City:      Van Buren                   State    : Arkansas
Country:  UNITED STATES                Region   : Memphis - 23

Claim #/Date   : 029412

Customer name : LINDA         THORNBRUGH        City :

---------------------- C Q I S   V I N   H I S T O R Y ----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE

--- S U P P L E M E N T A L   S U R V E Y :    NONE                        ---

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------

NO VEHICLE WARRANTY HISTORY AVAILABLE FOR THIS VEHICLE
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Page:  01                    CQIS DETAIL REPORT                 07/25/00 18:20:43

CQIS Report Number: WJBAA231  Program Type: Q       Orig Rpt #:  224715-98
Report Source:      MSS - FCSD - QSFS               Report Date: 10/02/1998

------------------------- R E P O R T   S U M M A R Y ----------------------

VEHICLE:        1998 RANGER 4X2,REGCAB ,PICKUP      VIN      : [redacted]
Engine :             2.5L SOHC EFI                  Odometer:   6,620 MILES
Operating Environ:                                  WCC      : 5K
Vehicle Use      :                                  Rsp. Act:

SYMPTOM: 3 06 1 00 CHASSIS                          TIRES/WHEELS
                   TIRE WEAR                        OTHER (CODE NOT AVAILABLE)
Additional Symptom:
Other Veh. With Concern:       Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                     Feature:                     Loc:
Causal Condition:                                   Photo:      Images:  0
Component Test Status:                 ---- Return Loc:
Vehicle Fixed?:          Customer satisfied?:       Repair Effectiveness (%):

---------------------------------- C O M M E N T S -----------------------------
--TYPE-- ---------------------------- COMMENT TEXT -----------------------------
CONCER   THE TIRES ARE WEARING ON THE OUTER EDGE.
REPAIR   FORD IS INVESTIGATING THE CONCERN AS PER THE TECH HOTLINE.
AUDIT    10/06/1998 09:05AM DATA ENTRY5         MSS - FCSD - QSFS
         SYMPTOM    3 06 0 00       CHANGED TO 3 06 1 00           BY NBAKER6

------------------------- C O N C E R N   D E T A I L S -----------------------

----------------- D I A G N O S T I C   I N F O R M A T I O N -----------------
Symp. Verif?:        Ease of Diagnosis:                    Level of Assistance:
Comp. Timing:        Base Timing      :                    MIL light on?       :
Test Stand  :        Road Test        :                    8D Number:
Prior Repair Attempts:                                     Repair Prior to Call: NO
DTCs KOEO:                                  KOEC:
     KOER:                                    CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used     Effective?

-------------------------- S E R V I C E   A C T I O N S ---------------------

Repair                           Number                                     Causal
Type   Component Number          Type         Description                    Comp.
NOA              FRONT           REPORTED     TIRES

----------------------- V E H I C L E   D E T A I L S -------------------------
Vehicle Build Date:         10/30/1997    Warranty Start Date:         05/19/1998
Date of Sale:               05/19/1998    Selling Dlr (Mkt,Dlr,Sub):   06018
Dealer Special Order:                     Gross Vehicle Weight:
LH/RH Drive:
                             - - - E N G I N E - - -
Engine: 2.5L SOHC EFI                     Tag: 8K          194 AC
Bld Dt:              Calb:    850AR05 A       Serial #:
                        - - - T R A N S M I S S I O N - - -
Trans: 4R44E 4SP AUTO                     Part #:
Bld Dt:                                    Serial #:
Model:                         Plt:                                     Shft:
                              - - - A X L E - - -
Axle:  2750# FORD 4.10 CONVE    Id Tag Code:             Bld Dt:
Serial #:                                                     Plt:
                          - - - A D D I T I O N A L - - -
Tire  : P225/70R15 SL ST BELT OWL A-S  Brand     :
Radio : ELETR  AM/FM STRO/DISC/CLK      A/C       : MANUAL AIR CONDITIONER
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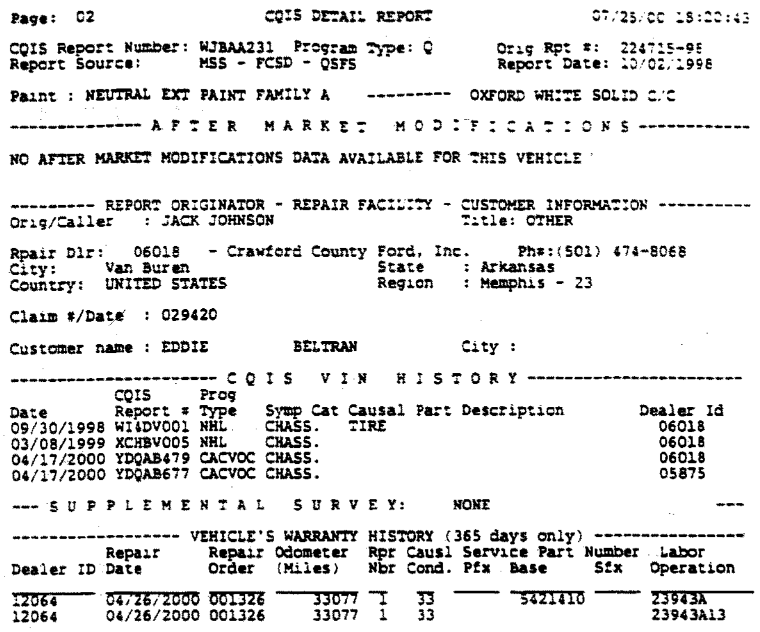
REDACTED



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Page:  02                  CQIS DETAIL REPORT                 07/25/00 15:20:43

CQIS Report Number: WJBAA231  Program Type: Q        Orig Rpt #:  224715-98
Report Source:      MSS - FCSD - QSFS                Report Date: 10/02/1998

Paint : NEUTRAL EXT PAINT FAMILY A    ---------  OXFORD WHITE SOLID C/C

------------- A F T E R   M A R K E T   M O D I F I C A T I O N S -----------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ---------
Orig/Caller    : JACK JOHNSON                    Title: OTHER

Rpair Dlr:   06018   - Crawford County Ford, Inc.     Ph#:(501) 474-8068
City:     Van Buren                    State     : Arkansas
Country:  UNITED STATES                Region    : Memphis - 23

Claim #/Date  : 029420

Customer name : EDDIE          BELTRAN            City :

---------------------- C Q I S   V I N   H I S T O R Y ----------------------
           CQIS      Prog
Date       Report #  Type   Symp Cat Causal Part Description         Dealer Id
09/30/1998 WI4DV001  NHL    CHASS.   TIRE                              06018
03/08/1999 XCHBV005  NHL    CHASS.                                     06018
04/17/2000 YDQAB479  CACVOC CHASS.                                     06018
04/17/2000 YDQAB677  CACVOC CHASS.                                     05875

--- S U P P L E M E N T A L   S U R V E Y:    NONE                         ---

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
           Repair     Repair Odometer Rpr Causl Service Part Number  Labor
Dealer ID  Date       Order  (Miles)  Nbr Cond. Pfx   Base    Sfx    Operation

12064      04/26/2000 001326    33077  1   33          5421410       23943A
12064      04/26/2000 001326    33077  1   33                        23943A13
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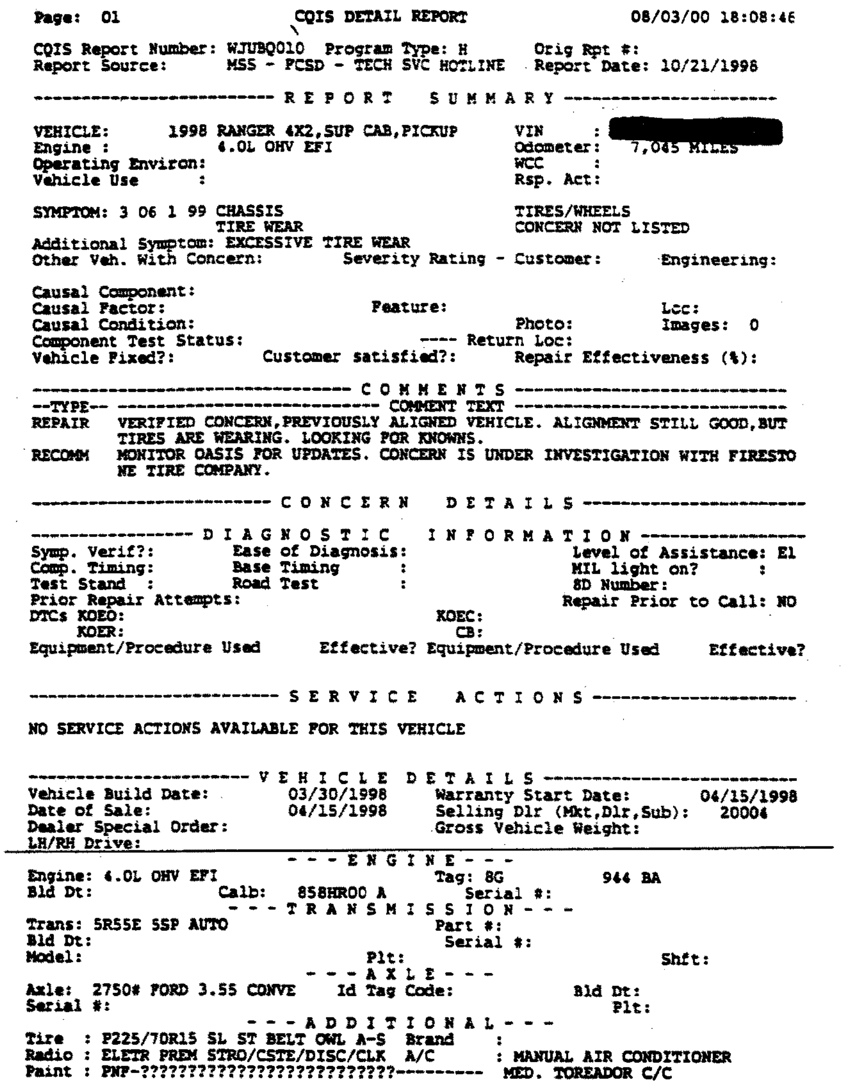

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Page: 01                        CQIS DETAIL REPORT                 08/03/00 18:08:46

CQIS Report Number: WJUBQ010  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 10/21/1998

------------------------- R E P O R T   S U M M A R Y ----------------------

VEHICLE:      1998 RANGER 4X2,SUP CAB,PICKUP       VIN      : [redacted]
Engine :      4.0L OHV EFI                          Odometer:  7,045 MILES
Operating Environ:                                  WCC      :
Vehicle Use       :                                 Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                          TIRES/WHEELS
                   TIRE WEAR                        CONCERN NOT LISTED
Additional Symptom: EXCESSIVE TIRE WEAR
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                       Feature:                     Loc:
Causal Condition:                                   Photo:        Images:  0
Component Test Status:                     ---- Return Loc:
Vehicle Fixed?:        Customer satisfied?:         Repair Effectiveness (%):

-------------------------------- C O M M E N T S ----------------------------
--TYPE-- ---------------------------- COMMENT TEXT ----------------------------
REPAIR   VERIFIED CONCERN,PREVIOUSLY ALIGNED VEHICLE. ALIGNMENT STILL GOOD,BUT
         TIRES ARE WEARING. LOOKING FOR KNOWNS.
RECOMM   MONITOR OASIS FOR UPDATES. CONCERN IS UNDER INVESTIGATION WITH FIRESTO
         NE TIRE COMPANY.

------------------------- C O N C E R N   D E T A I L S -----------------------

---------------- D I A G N O S T I C   I N F O R M A T I O N -----------------
Symp. Verif?:          Ease of Diagnosis:                Level of Assistance: E1
Comp. Timing:          Base Timing       :               MIL light on?       :
Test Stand  :          Road Test         :               8D Number:
Prior Repair Attempts:                                   Repair Prior to Call: NO
DTCs KOEO:                                 KOEC:
     KOER:                                   CB:
Equipment/Procedure Used     Effective? Equipment/Procedure Used     Effective?

------------------------- S E R V I C E   A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

----------------------- V E H I C L E   D E T A I L S -------------------------
Vehicle Build Date:         03/30/1998    Warranty Start Date:        04/15/1998
Date of Sale:               04/15/1998    Selling Dlr (Mkt,Dlr,Sub):   20004
Dealer Special Order:                     Gross Vehicle Weight:
LH/RH Drive:
                            - - - E N G I N E - - -
Engine: 4.0L OHV EFI                       Tag: 8G          944 BA
Bld Dt:                 Calb:   858HR00 A     Serial #:
                     - - - T R A N S M I S S I O N - - -
Trans: 5R55E 5SP AUTO                      Part #:
Bld Dt:                                      Serial #:
Model:                           Plt:                                Shft:
                              - - - A X L E - - -
Axle:  2750# FORD 3.55 CONVE     Id Tag Code:              Bld Dt:
Serial #:                                                    Plt:
                        - - - A D D I T I O N A L - - -
Tire   : P225/70R15 SL ST BELT OWL A-S  Brand    :
Radio  : ELETR PREM STRO/CSTE/DISC/CLK  A/C      : MANUAL AIR CONDITIONER
Paint  : PNF-???????????????????????????---------  MED. TOREADOR C/C
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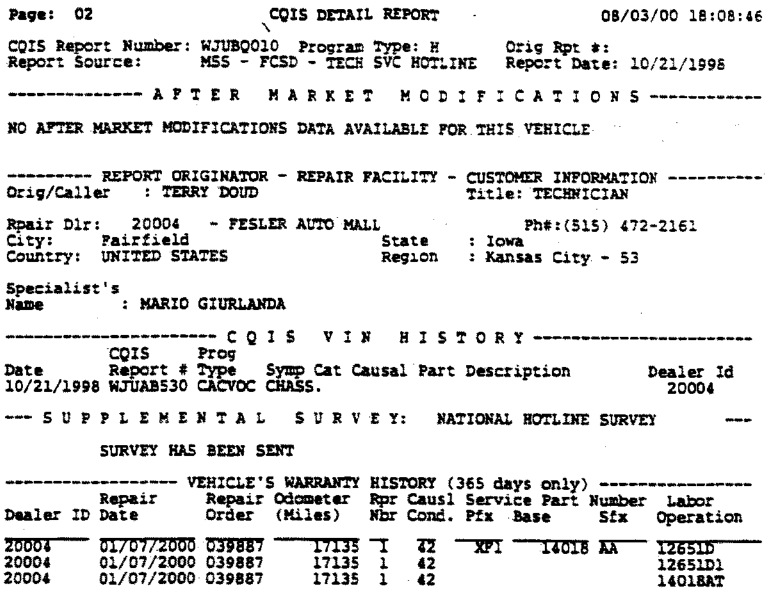
REDACTED



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Page:  02                    CQIS DETAIL REPORT                 08/03/00 18:08:46

CQIS Report Number: WJUBQ010  Program Type: H          Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE      Report Date: 10/21/1998

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : TERRY DOUD                           Title: TECHNICIAN

Rpair Dlr:   20004   - FESLER AUTO MALL                     Ph#:(515) 472-2161
City:      Fairfield                      State     : Iowa
Country:  UNITED STATES                   Region    : Kansas City - 53

Specialist's
Name         : MARIO GIURLANDA

---------------------- C Q I S   V I N   H I S T O R Y -----------------------
           CQIS      Prog
Date       Report # Type   Symp Cat Causal Part Description        Dealer Id
10/21/1998 WJUAB530 CACVOC CHASS.                                     20004

--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY       ---

          SURVEY HAS BEEN SENT

----------------- VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
           Repair      Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID Date         Order  (Miles)   Nbr Cond. Pfx  Base      Sfx  Operation

20004     01/07/2000 039887       17135  1    42    XF1    14018 AA    12651D
20004     01/07/2000 039887       17135  1    42                       12651D1
20004     01/07/2000 039887       17135  1    42                       14018AT
```

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Page: 01                    CQIS DETAIL REPORT                 08/03/00 18:08:47

CQIS Report Number: WKDDP002  Program Type: H         Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 11/04/1996

------------------------ R E P O R T   S U M M A R Y ----------------------

VEHICLE:       1998 RANGER 4X2,REGCAB ,PICKUP        VIN      : [redacted]
Engine :             2.5L SOHC EFI                   Odometer:   3,587 MILES
Operating Environ:                                   WCC      : 5K04
Vehicle Use     :                                    Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                           TIRES/WHEELS
                   TIRE WEAR                         CONCERN NOT LISTED
Additional Symptom: EXCESSIVE TIRE WEAR
Other Veh. With Concern:          Severity Rating - Customer:      Engineering:

Causal Component:              TIRE                  TIRE
Causal Factor:                          Feature:                   Loc:
Causal Condition:                                    Photo:        Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:  NO     Customer satisfied?:         Repair Effectiveness (%):

-------------------------------- C O M M E N T S ---------------------------
--TYPE-- ------------------------- COMMENT TEXT ---------------------------
REPAIR   SM STATES THAT THE VEHICLE HAS EXCESSIVE TIRE WEAR.  STATES THAT THE
         OWNER TOOK THE VEHICLE TO FIRESTONE AND WAS ADV'D THAT THE CONCERN
         IS THE VEHICLE'S FAULT NOT THE TIRES.  STATES THAT THE VEHICLE IS
         WITHIN ALIGNMENT SPECS.  STATES HAS TWO OTHER VEHICLES WITH THE SAME
         CONCERN.  SM LOOKING FOR ANY KNOWNS.
RECOMM   ISM 98-10-010   CONTACT DIANO TARABOCHIA AT EDISON PLANT 9-1-632-4833
         LEFT A MESSAGE WITH DIANO TO CALL BACK.  ADV SM LEFT A MESSAGE WITH
         ENGINEERING.  ADV NOT TO PERFORM ANY REPAIRS AT THIS TIME.
TECH/C   12/07/1998 11:15AM SURVEY ENTRY           MSS - FCSD - TECH SVC HOTLINE
         NO REPAIR AVAILABLE
REPAIR   05/21/1999 03:22PM DOUG BEARDSLEY         MSS - FCSD - TECH SVC HOTLINE
         SM HAS EXCESSIVE TIRE WEAR AND THE LOCAL FIRESTONE DEALER WON'T
         WARRANTY THE TIRES
RECOMM   TSB 98-05-02   TIRE COMPANY TELEPHONE #'S FOR CUSTOMER ASSISTANCE
         ADVISED SM OF THE TSB AND TO CONTACT THE CSM FOR FURTHER ACTION TO
         TAKE
REPAIR   07/06/1999 10:24AM JOHN CENTA             MSS - FCSD - TECH SVC HOTLINE
         FSE (MARK) CALLED SEEKING INFORMATION ON POSSIBLE FIX FROM ENGINEERING
RECOMM   AFTER TALKING WITH CONCERN SPECIALIST, IT APPEARS ENG. DOES NOT HAVE A
         FIX...ADV. TO SET TOE WITHIN NOMINAL SETTINGS (1/8 POSITIVE) ADV. TO
         TRY DIFFERENT TIRES.
AUDIT    07/25/1999 10:58PM MARK ROBINSON(FSE)   MSS - FCSD - REG - PITTSBURGH
         APPROVED FOR TECH ASSIST REFERRAL PROCESSING BY MROBIN30
ADD-ON   08/10/1999 08:30AM MARK ROBINSON(FSE)   MSS - FCSD - REG - PITTSBURGH
         CONCERN IS UNDER INVESTAGATION.

------------------------- C O N C E R N   D E T A I L S -------------------

---------------- D I A G N O S T I C   I N F O R M A T I O N ----------------
Symp. Verif?:        Ease of Diagnosis:                   Level of Assistance: E1
Comp. Timing:        Base Timing        :                 MIL light on?       :
Test Stand  :        Road Test          :                 8D Number:
Prior Repair Attempts:                                   Repair Prior to Call: NO
DTCs KOEO:                                  KOEC:
     KOER:                                    CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used      Effective?

-------------------------- S E R V I C E   A C T I O N S --------------------
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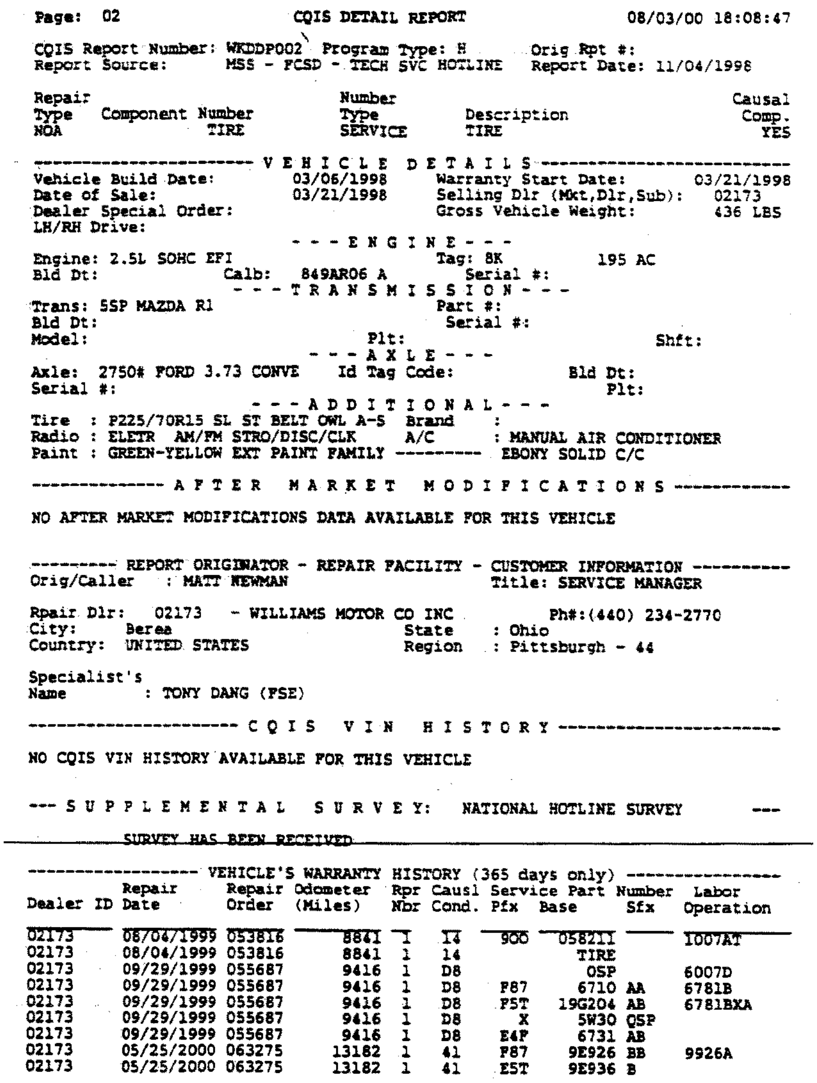

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Page:  02                CQIS DETAIL REPORT                 08/03/00 18:08:47

CQIS Report Number: WKDDP002  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 11/04/1998

Repair                             Number                                 Causal
Type   Component Number            Type         Description                Comp.
NOA                 TIRE           SERVICE      TIRE                        YES

------------------------ V E H I C L E  D E T A I L S ---------------------------
Vehicle Build Date:            03/06/1998     Warranty Start Date:       03/21/1998
Date of Sale:                  03/21/1998     Selling Dlr (Mkt,Dlr,Sub):   02173
Dealer Special Order:                         Gross Vehicle Weight:        436 LBS
LH/RH Drive:
                              - - - E N G I N E - - -
Engine: 2.5L SOHC EFI                         Tag: 8K           195 AC
Bld Dt:                Calb:   849AR06 A         Serial #:
                          - - - T R A N S M I S S I O N - - -
Trans: 5SP MAZDA R1                           Part #:
Bld Dt:                                        Serial #:
Model:                             Plt:                              Shft:
                                 - - - A X L E - - -
Axle:  2750# FORD 3.73 CONVE    Id Tag Code:               Bld Dt:
Serial #:                                                      Plt:
                           - - - A D D I T I O N A L - - -
Tire  : P225/70R15 SL ST BELT OWL A-S  Brand    :
Radio : ELETR  AM/FM STRO/DISC/CLK     A/C      : MANUAL AIR CONDITIONER
Paint : GREEN-YELLOW EXT PAINT FAMILY ---------  EBONY SOLID C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller   : MATT NEWMAN                        Title: SERVICE MANAGER

Rpair Dlr:   02173   - WILLIAMS MOTOR CO INC          Ph#:(440) 234-2770
City:      Berea                          State    : Ohio
Country:  UNITED STATES                   Region   : Pittsburgh - 44

Specialist's
Name        : TONY DANG (FSE)

---------------------- C Q I S   V I N   H I S T O R Y -----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY        ---

         SURVEY HAS BEEN RECEIVED

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
            Repair       Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID  Date         Order  (Miles)   Nbr Cond. Pfx  Base       Sfx  Operation

02173      08/04/1999 053816     8841   1    14     900   058211        1007AT
02173      08/04/1999 053816     8841   1    14             TIRE
02173      09/29/1999 055687     9416   1    D8              OSP        6007D
02173      09/29/1999 055687     9416   1    D8     F87     6710 AA     6781B
02173      09/29/1999 055687     9416   1    D8     F5T   19G204 AB     6781BXA
02173      09/29/1999 055687     9416   1    D8       X     5W30 OSP
02173      09/29/1999 055687     9416   1    D8     E4F     6731 AB
02173      05/25/2000 063275    13182   1    41     F87    9E926 BB     9926A
02173      05/25/2000 063275    13182   1    41     E5T    9E936 B
```

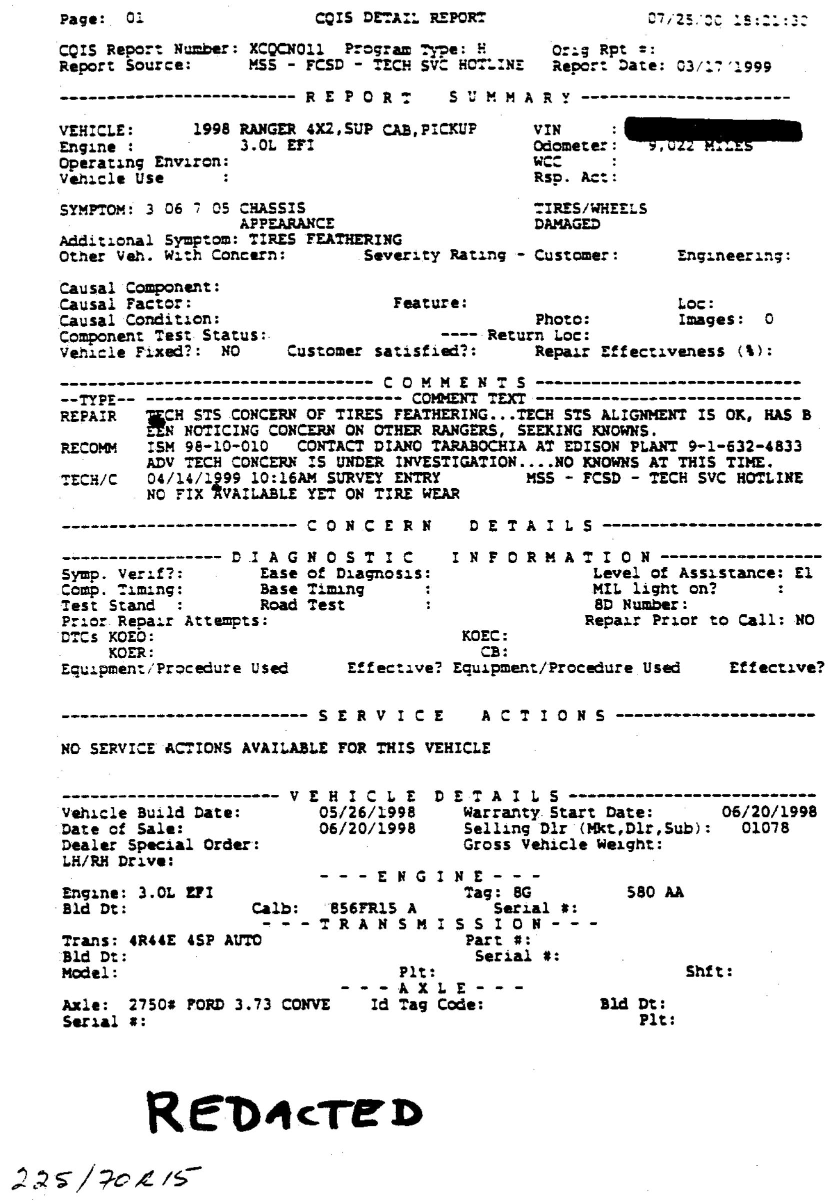
```
Page:  03                  CQIS DETAIL REPORT      .          08/03/00 18:08:47

CQIS Report Number: WKDDP002  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 11/04/1998

----------------- VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
          Repair      Repair Odometer  Rpr Causl Service Part Number  Labor

Dealer ID Date         Order  (Miles)   Nbr Cond. Pfx  Base      Sfx   Operation
_________ __________ ______ _________  __   __   ____ ________  _____ ___________

02173     06/07/2000 063650     13385  1    14    XL5      1102 BA    2001BF
02173     06/07/2000 063650     13385  1    14    FOZ      1190 A     2001B5T
```



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Page:  01                   CQIS DETAIL REPORT                07/25/00 18:21:30

CQIS Report Number: XCQCN011  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 03/17/1999

------------------------- R E P O R T   S U M M A R Y ----------------------

VEHICLE:      1998 RANGER 4X2,SUP CAB,PICKUP       VIN      : [redacted]
Engine :             3.0L EFI                        Odometer:   9,022 MILES
Operating Environ:                                   WCC      :
Vehicle Use       :                                  Rsp. Act:

SYMPTOM: 3 06 7 05 CHASSIS                           TIRES/WHEELS
                  APPEARANCE                         DAMAGED
Additional Symptom: TIRES FEATHERING
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                        Feature:                   Loc:
Causal Condition:                                    Photo:      Images:  0
Component Test Status:                 ---- Return Loc:
Vehicle Fixed?:  NO    Customer satisfied?:    Repair Effectiveness (%):

--------------------------------- C O M M E N T S ----------------------------
--TYPE-- ---------------------------- COMMENT TEXT ----------------------------
REPAIR    TECH STS CONCERN OF TIRES FEATHERING...TECH STS ALIGNMENT IS OK, HAS B
          EEN NOTICING CONCERN ON OTHER RANGERS, SEEKING KNOWNS.
RECOMM    ISM 98-10-010   CONTACT DIANO TARABOCHIA AT EDISON PLANT 9-1-632-4833
          ADV TECH CONCERN IS UNDER INVESTIGATION....NO KNOWNS AT THIS TIME.
TECH/C    04/14/1999 10:16AM SURVEY ENTRY        MSS - FCSD - TECH SVC HOTLINE
          NO FIX AVAILABLE YET ON TIRE WEAR

------------------------- C O N C E R N   D E T A I L S -----------------------

----------------- D I A G N O S T I C   I N F O R M A T I O N -----------------
Symp. Verif?:        Ease of Diagnosis:                  Level of Assistance: E1
Comp. Timing:        Base Timing       :                 MIL light on?      :
Test Stand  :        Road Test         :                 8D Number:
Prior Repair Attempts:                                  Repair Prior to Call: NO
DTCs KOEO:                                 KOEC:
    KOER:                                   CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used      Effective?

-------------------------- S E R V I C E   A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

----------------------- V E H I C L E   D E T A I L S -------------------------
Vehicle Build Date:      05/26/1998    Warranty Start Date:          06/20/1998
Date of Sale:            06/20/1998    Selling Dlr (Mkt,Dlr,Sub):   01078
Dealer Special Order:                  Gross Vehicle Weight:
LH/RH Drive:
                             - - - E N G I N E - - -
Engine: 3.0L EFI                        Tag: 8G           580 AA
Bld Dt:              Calb:   856FR15 A      Serial #:
                     - - - T R A N S M I S S I O N - - -
Trans: 4R44E 4SP AUTO                     Part #:
Bld Dt:                                   Serial #:
Model:                        Plt:                                    Shft:
                               - - - A X L E - - -
Axle:  2750# FORD 3.73 CONVE     Id Tag Code:           Bld Dt:
Serial #:                                                  Plt:
```
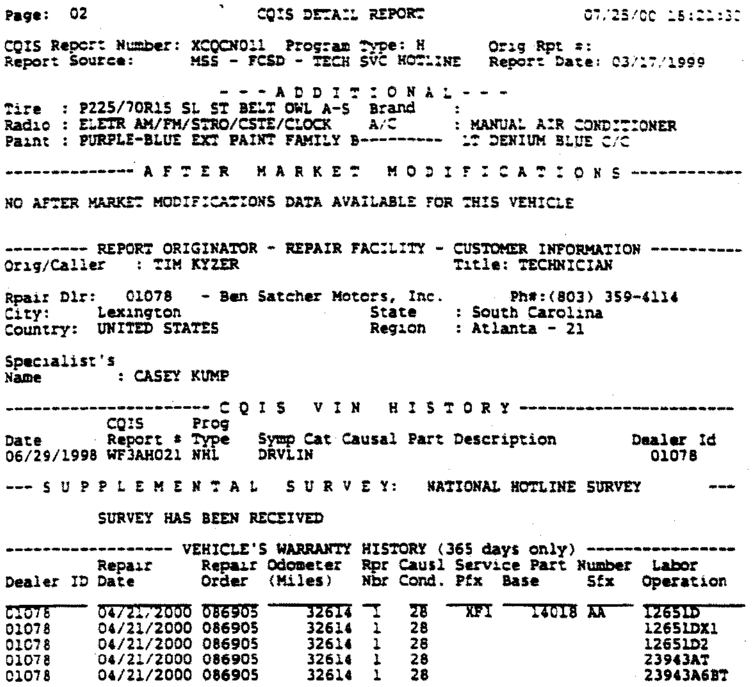

REDACTED

225/70R15



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Page:  02                  CQIS DETAIL REPORT                  07/25/00 15:21:33

CQIS Report Number: XCQCN011  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 03/17/1999

                    - - - A D D I T I O N A L - - -
Tire  : P225/70R15 SL ST BELT OWL A-S  Brand     :
Radio : ELETR AM/FM/STRO/CSTE/CLOCK    A/C       : MANUAL AIR CONDITIONER
Paint : PURPLE-BLUE EXT PAINT FAMILY B---------  LT DENIUM BLUE C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : TIM KYZER                       Title: TECHNICIAN

Rpair Dlr:   01078   - Ben Satcher Motors, Inc.       Ph#:(803) 359-4114
City:      Lexington                   State    : South Carolina
Country:   UNITED STATES               Region   : Atlanta - 21

Specialist's
Name          : CASEY KUMP

---------------------- C Q I S   V I N   H I S T O R Y -----------------------
           CQIS      Prog
Date       Report #  Type   Symp Cat Causal Part Description         Dealer Id
06/29/1998 WF3AH021  NHL    DRVLIN                                    01078

--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY       ---

          SURVEY HAS BEEN RECEIVED

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
          Repair      Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID Date        Order  (Miles)   Nbr Cond. Pfx  Base     Sfx   Operation

01078     04/21/2000  086905    32614   1   28    XF1    14018  AA   12651D
01078     04/21/2000  086905    32614   1   28                       12651DX1
01078     04/21/2000  086905    32614   1   28                       12651D2
01078     04/21/2000  086905    32614   1   28                       23943AT
01078     04/21/2000  086905    32614   1   28                       23943A6BT
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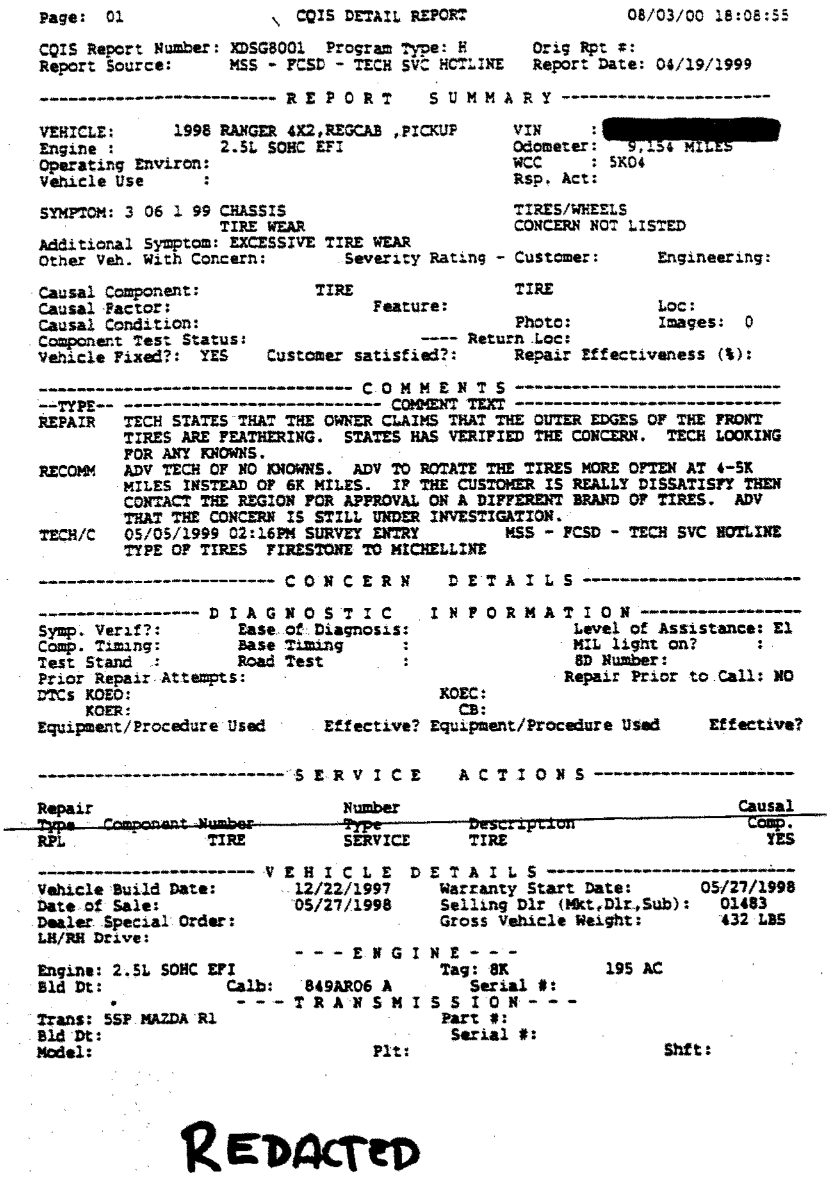

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Page: 01                  CQIS DETAIL REPORT                 08/03/00 18:08:55

CQIS Report Number: XDSG8001  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 04/19/1999

-------------------------- R E P O R T   S U M M A R Y -----------------------

VEHICLE:       1998 RANGER 4X2,REGCAB ,PICKUP      VIN      : [redacted]
Engine :              2.5L SOHC EFI                Odometer:   9,154 MILES
Operating Environ:                                 WCC      : 5K04
Vehicle Use       :                                Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                         TIRES/WHEELS
                   TIRE WEAR                       CONCERN NOT LISTED
Additional Symptom: EXCESSIVE TIRE WEAR
Other Veh. With Concern:      Severity Rating - Customer:       Engineering:

Causal Component:              TIRE                TIRE
Causal Factor:                         Feature:                     Loc:
Causal Condition:                                  Photo:           Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?: YES    Customer satisfied?:        Repair Effectiveness (%):

---------------------------------- C O M M E N T S ----------------------------
--TYPE-- ---------------------------- COMMENT TEXT ----------------------------
REPAIR   TECH STATES THAT THE OWNER CLAIMS THAT THE OUTER EDGES OF THE FRONT
         TIRES ARE FEATHERING.  STATES HAS VERIFIED THE CONCERN.  TECH LOOKING
         FOR ANY KNOWNS.
RECOMM   ADV TECH OF NO KNOWNS.  ADV TO ROTATE THE TIRES MORE OFTEN AT 4-5K
         MILES INSTEAD OF 6K MILES.  IF THE CUSTOMER IS REALLY DISSATISFY THEN
         CONTACT THE REGION FOR APPROVAL ON A DIFFERENT BRAND OF TIRES.  ADV
         THAT THE CONCERN IS STILL UNDER INVESTIGATION.
TECH/C   05/05/1999 02:16PM SURVEY ENTRY          MSS - FCSD - TECH SVC HOTLINE
         TYPE OF TIRES  FIRESTONE TO MICHELLINE

-------------------------- C O N C E R N   D E T A I L S -----------------------

----------------- D I A G N O S T I C   I N F O R M A T I O N -----------------
Symp. Verif?:        Ease of Diagnosis:                   Level of Assistance: E1
Comp. Timing:        Base Timing      :                   MIL light on?       :
Test Stand   :       Road Test        :                   8D Number:
Prior Repair Attempts:                                   Repair Prior to Call: NO
DTCs KOEO:                                 KOEC:
     KOER:                                 CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used      Effective?

--------------------------- S E R V I C E   A C T I O N S ----------------------

Repair                             Number                                 Causal
Type    Component Number           Type       Description                 Comp.
RPL            TIRE                SERVICE    TIRE                          YES

----------------------- V E H I C L E   D E T A I L S -------------------------
Vehicle Build Date:       12/22/1997    Warranty Start Date:         05/27/1998
Date of Sale:             05/27/1998    Selling Dlr (Mkt,Dlr,Sub):   01483
Dealer Special Order:                   Gross Vehicle Weight:         432 LBS
LH/RH Drive:
                               - - - E N G I N E - - -
Engine: 2.5L SOHC EFI                   Tag: 8K            195 AC
Bld Dt:              Calb:   849AR06 A      Serial #:
                       - - - T R A N S M I S S I O N - - -
Trans: 5SP MAZDA R1                     Part #:
Bld Dt:                                  Serial #:
Model:                            Plt:                             Shft:
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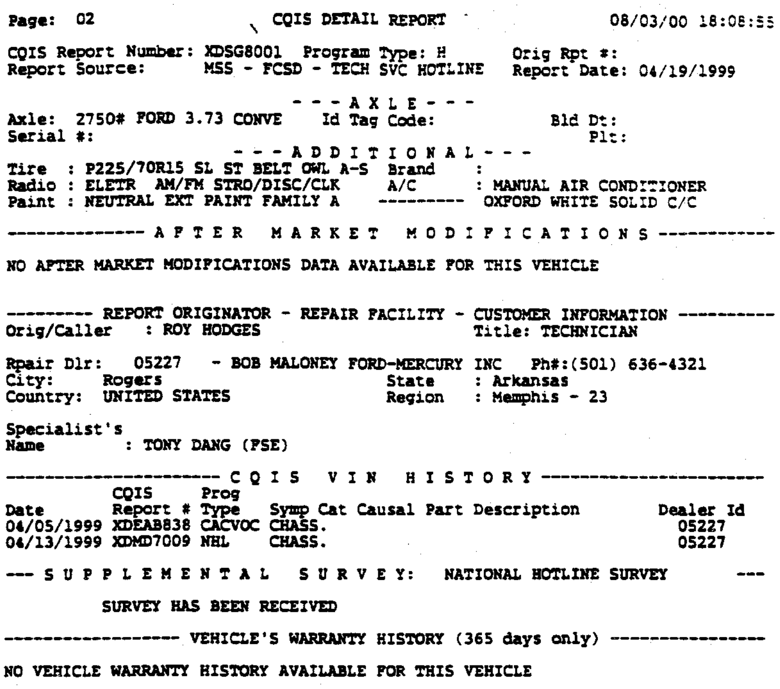
REDACTED



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Page:  02                 CQIS DETAIL REPORT                 08/03/00 18:08:55

CQIS Report Number: XDSG8001  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 04/19/1999

                              - - - A X L E - - -
Axle:  2750# FORD 3.73 CONVE    Id Tag Code:              Bld Dt:
Serial #:                                                    Plt:
                           - - - A D D I T I O N A L - - -
Tire  : P225/70R15 SL ST BELT OWL A-S  Brand    :
Radio : ELETR  AM/FM STRO/DISC/CLK     A/C      : MANUAL AIR CONDITIONER
Paint : NEUTRAL EXT PAINT FAMILY A    ---------  OXFORD WHITE SOLID C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : ROY HODGES                         Title: TECHNICIAN

Rpair Dlr:   05227   - BOB MALONEY FORD-MERCURY INC   Ph#:(501) 636-4321
City:       Rogers                          State    : Arkansas
Country:  UNITED STATES                     Region   : Memphis - 23

Specialist's
Name          : TONY DANG (FSE)

---------------------- C Q I S   V I N   H I S T O R Y -----------------------
           CQIS      Prog
Date       Report #  Type   Symp Cat Causal Part Description           Dealer Id
04/05/1999 XDEAB838 CACVOC CHASS.                                       05227
04/13/1999 XDMD7009 NHL    CHASS.                                       05227

--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY       ---

          SURVEY HAS BEEN RECEIVED

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------

NO VEHICLE WARRANTY HISTORY AVAILABLE FOR THIS VEHICLE
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"

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Page:  01               \ CQIS DETAIL REPORT                    08/03/00 18:09:10

CQIS Report Number: XJLC2020  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 10/12/1999

-------------------------- R E P O R T   S U M M A R Y ----------------------

VEHICLE:       1999 RANGER 4X2,REGCAB ,PICKUP        VIN      : [redacted]
Engine :            2.5L SOHC EFI                    Odometer:   7,858 MILES
Operating Environ:                                   WCC      :
Vehicle Use     :                                    Rsp. Act:

SYMPTOM: 3 06 1 00 CHASSIS                           TIRES/WHEELS
                   TIRE WEAR                         OTHER (CODE NOT AVAILABLE)
Additional Symptom: TIRES FEATHERING
Other Veh. With Concern:        Severity Rating - Customer:       Engineering:

Causal Component:
Causal Factor:                         Feature:                      Loc:
Causal Condition:                                   Photo:           Images:  0
Component Test Status:                      ---- Return Loc:
Vehicle Fixed?:          Customer satisfied?:     Repair Effectiveness (%):

----------------------------------- C O M M E N T S ---------------------------
--TYPE-- ---------------------------- COMMENT TEXT ----------------------------
REPAIR   TECH STATES ALL FOUR TIRES ARE FEATHERING. TECH STATES CUSTOMER
         IS NOT HAPPY WITH THE TIRES.
RECOMM   ADV. TECH TO CONTACT CSM FOR ASSISTANCE. ADV. TO CHECK VEHICLE
         ALIGNMENT AND TIRE PRESSURE. ADV. TO VERIFY HOW VEHICLE IS USED. ADV.
         CONCERN IS UNDER INVESTIGATION. ADV. TO FILE EDSR'S FOR CONCERNS.
         --TRIED TO CONTACT CARLOS ARMESTO BUT THERE WAS NO ANSWER.

-------------------------- C O N C E R N   D E T A I L S -----------------------

----------------- D I A G N O S T I C   I N F O R M A T I O N -----------------
Symp. Verif?:          Ease of Diagnosis:                Level of Assistance: E1
Comp. Timing:          Base Timing      :                MIL light on?       :
Test Stand  :          Road Test        :                8D Number:
Prior Repair Attempts:                                  Repair Prior to Call: NO
DTCs KOEO:                                  KOEC:
    KOER:                                     CB:
Equipment/Procedure Used       Effective? Equipment/Procedure Used      Effective?

-------------------------- S E R V I C E   A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

------------------------ V E H I C L E   D E T A I L S -------------------------
Vehicle Build Date:        10/13/1998      Warranty Start Date:        04/22/1999
~~Date of Sale:              04/22/1999~~      Selling Dlr (Mkt,Dlr,Sub):    00869
Dealer Special Order:                      Gross Vehicle Weight:         432 LBS
LH/RH Drive:
                              - - - E N G I N E - - -
Engine: 2.5L SOHC EFI                    Tag: 9G            194 AA
Bld Dt:              Calb:   9B1ABAG N       Serial #:
                       - - - T R A N S M I S S I O N - - -
Trans: 4R44E 4SP AUTO                      Part #:
Bld Dt:                                     Serial #:
Model:                             Plt:                          Shft:
                                - - - A X L E - - -
Axle:  2750# FORD 4.10 CONVE    Id Tag Code:           Bld Dt:
Serial #:                                                   Plt:
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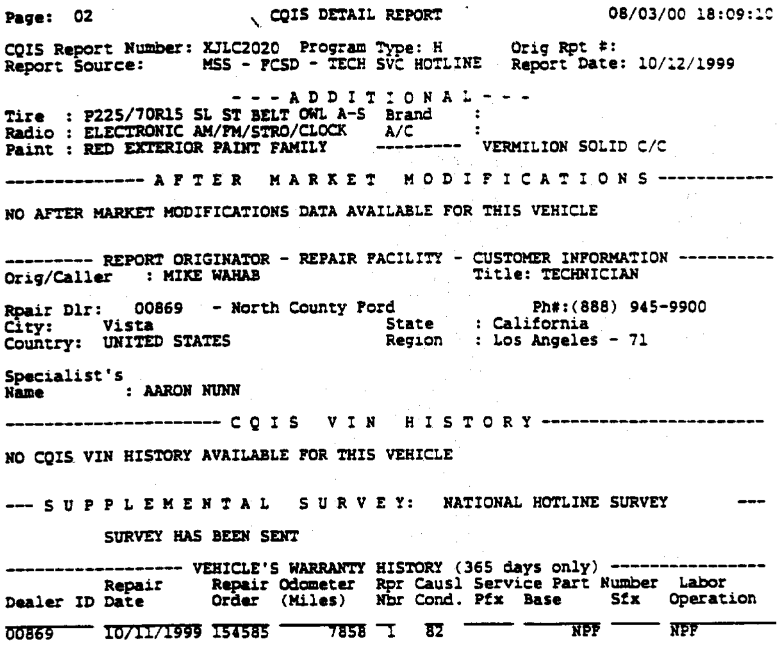
REDACTED

225/70R15



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Page:  02                   CQIS DETAIL REPORT                 08/03/00 18:09:10

CQIS Report Number: XJLC2020  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 10/12/1999

                         - - - A D D I T I O N A L - - -
Tire  : P225/70R15 SL ST BELT OWL A-S  Brand     :
Radio : ELECTRONIC AM/FM/STRO/CLOCK    A/C       :
Paint : RED EXTERIOR PAINT FAMILY      ---------  VERMILION SOLID C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : MIKE WAHAB                         Title: TECHNICIAN

Rpair Dlr:   00869   - North County Ford                  Ph#:(888) 945-9900
City:     Vista                        State     : California
Country:  UNITED STATES                Region    : Los Angeles - 71

Specialist's
Name          : AARON NUNN
---------------------- C Q I S   V I N   H I S T O R Y -----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY        ---

          SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
          Repair     Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID Date       Order  (Miles)   Nbr Cond. Pfx   Base    Sfx    Operation

00869     10/11/1999 154585      7858  1   82               NPF       NPF
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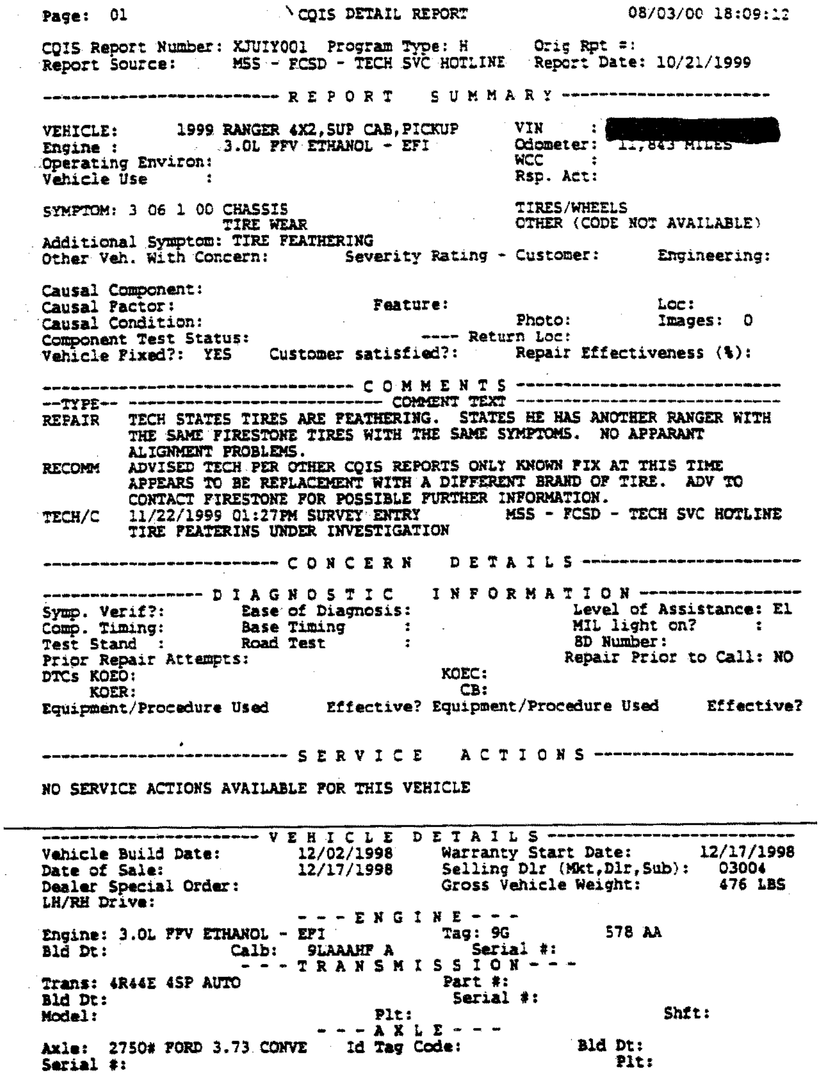

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Page: 01                    CQIS DETAIL REPORT                 08/03/00 18:09:12

CQIS Report Number: XJUIY001  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 10/21/1999

------------------------- R E P O R T    S U M M A R Y ----------------------

VEHICLE:       1999 RANGER 4X2,SUP CAB,PICKUP       VIN      : [redacted]
Engine :             3.0L FFV ETHANOL - EFI         Odometer:
Operating Environ:                                  WCC      :
Vehicle Use       :                                 Rsp. Act:

SYMPTOM: 3 06 1 00 CHASSIS                          TIRES/WHEELS
                   TIRE WEAR                        OTHER (CODE NOT AVAILABLE)
Additional Symptom: TIRE FEATHERING
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                      Feature:                      Loc:
Causal Condition:                                   Photo:        Images:  0
Component Test Status:                  ---- Return Loc:
Vehicle Fixed?:  YES    Customer satisfied?:      Repair Effectiveness (%):

---------------------------------- C O M M E N T S ---------------------------
--TYPE-- ----------------------------- COMMENT TEXT ----------------------------
REPAIR   TECH STATES TIRES ARE FEATHERING.  STATES HE HAS ANOTHER RANGER WITH
         THE SAME FIRESTONE TIRES WITH THE SAME SYMPTOMS.  NO APPARANT
         ALIGNMENT PROBLEMS.
RECOMM   ADVISED TECH PER OTHER CQIS REPORTS ONLY KNOWN FIX AT THIS TIME
         APPEARS TO BE REPLACEMENT WITH A DIFFERENT BRAND OF TIRE.  ADV TO
         CONTACT FIRESTONE FOR POSSIBLE FURTHER INFORMATION.
TECH/C   11/22/1999 01:27PM SURVEY ENTRY          MSS - FCSD - TECH SVC HOTLINE
         TIRE FEATERINS UNDER INVESTIGATION

------------------------- C O N C E R N    D E T A I L S ----------------------

----------------- D I A G N O S T I C    I N F O R M A T I O N ----------------
Symp. Verif?:         Ease of Diagnosis:                 Level of Assistance: E1
Comp. Timing:         Base Timing       :                MIL light on?       :
Test Stand  :         Road Test         :                8D Number:
Prior Repair Attempts:                                  Repair Prior to Call: NO
DTCs KOEO:                                  KOEC:
     KOER:                                    CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used      Effective?

-------------------------- S E R V I C E    A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

------------------------ V E H I C L E   D E T A I L S -------------------------
Vehicle Build Date:        12/02/1998    Warranty Start Date:        12/17/1998
Date of Sale:              12/17/1998    Selling Dlr (Mkt,Dlr,Sub):   03004
Dealer Special Order:                    Gross Vehicle Weight:        476 LBS
LH/RH Drive:
                              - - - E N G I N E - - -
Engine: 3.0L FFV ETHANOL - EFI           Tag: 9G         578 AA
Bld Dt:               Calb:    9LAAAHF A        Serial #:
                        - - - T R A N S M I S S I O N - - -
Trans: 4R44E 4SP AUTO                    Part #:
Bld Dt:                                   Serial #:
Model:                          Plt:                            Shft:
                              - - - A X L E - - -
Axle:  2750# FORD 3.73 CONVE    Id Tag Code:          Bld Dt:
Serial #:                                                Plt:
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REDACTED

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Page:  02                  CQIS DETAIL REPORT                08/03/00 18:09:12

CQIS Report Number: XJUIY001  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 10/21/1999

                    - - - A D D I T I O N A L - - -
Tire  : P225/70R15SL S/BLT RBL A-S     Brand    :
Radio : ELETR AM/FM/STRO/CSTE/CLOCK    A/C      : MANUAL AIR CONDITIONER
Paint : PNF-??????????????????????????---------  MED. TOREADOR C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller   : DAVID STEELE                    Title: TECHNICIAN

Rpair Dlr:   07749   - FUTURE FORD                    Ph#:(916) 969-3600
City:      Roseville                     State    : California
Country:  UNITED STATES                  Region   : San Francisco - 72

Specialist's
Name         : ERIK KUNZE(FSE)
---------------------- C Q I S   V I N   H I S T O R Y -----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY        ---

         SURVEY HAS BEEN RECEIVED

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
         Repair     Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID Date      Order  (Miles)   Nbr Cond. Pfx  Base     Sfx   Operation
--------- --------- ------ --------- --- ----- ---- -------- ----- ----------
07749    10/21/1999 334847     11843  1   W6         FRONT         3001A
07749    10/21/1999 334847     11843  1   W6                       3001A6
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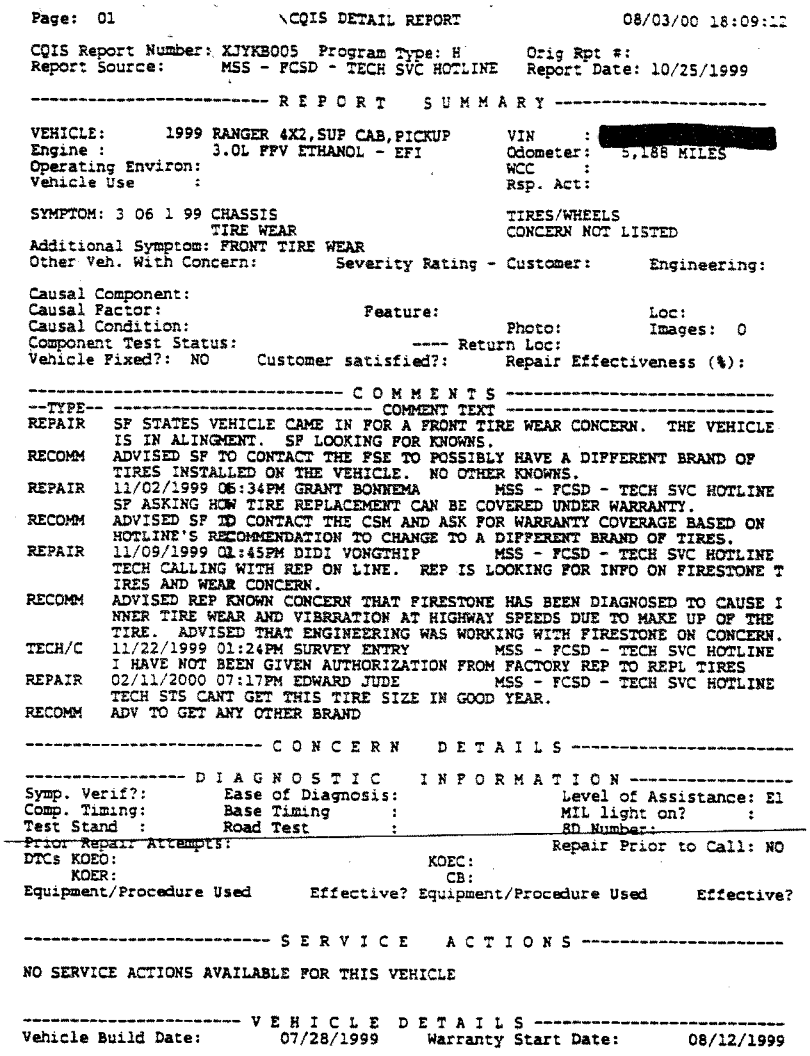

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Page:  01                 \CQIS DETAIL REPORT                08/03/00 18:09:12

CQIS Report Number: XJYKB005  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 10/25/1999

------------------------ R E P O R T   S U M M A R Y ----------------------

VEHICLE:       1999 RANGER 4X2,SUP CAB,PICKUP      VIN      : [redacted]
Engine :            3.0L FFV ETHANOL - EFI          Odometer:  5,188 MILES
Operating Environ:                                  WCC      :
Vehicle Use      :                                  Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                          TIRES/WHEELS
                   TIRE WEAR                        CONCERN NOT LISTED
Additional Symptom: FRONT TIRE WEAR
Other Veh. With Concern:       Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                      Feature:                    Loc:
Causal Condition:                                   Photo:      Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:  NO    Customer satisfied?:     Repair Effectiveness (%):

-------------------------------- C O M M E N T S --------------------------
--TYPE-- ------------------------- COMMENT TEXT ---------------------------
REPAIR   SF STATES VEHICLE CAME IN FOR A FRONT TIRE WEAR CONCERN.  THE VEHICLE
         IS IN ALINGMENT.  SF LOOKING FOR KNOWNS.
RECOMM   ADVISED SF TO CONTACT THE FSE TO POSSIBLY HAVE A DIFFERENT BRAND OF
         TIRES INSTALLED ON THE VEHICLE.  NO OTHER KNOWNS.
REPAIR   11/02/1999 06:34PM GRANT BONNEMA        MSS - FCSD - TECH SVC HOTLINE
         SF ASKING HOW TIRE REPLACEMENT CAN BE COVERED UNDER WARRANTY.
RECOMM   ADVISED SF TO CONTACT THE CSM AND ASK FOR WARRANTY COVERAGE BASED ON
         HOTLINE'S RECOMMENDATION TO CHANGE TO A DIFFERENT BRAND OF TIRES.
REPAIR   11/09/1999 01:45PM DIDI VONGTHIP        MSS - FCSD - TECH SVC HOTLINE
         TECH CALLING WITH REP ON LINE.  REP IS LOOKING FOR INFO ON FIRESTONE T
         IRES AND WEAR CONCERN.
RECOMM   ADVISED REP KNOWN CONCERN THAT FIRESTONE HAS BEEN DIAGNOSED TO CAUSE I
         NNER TIRE WEAR AND VIBRRATION AT HIGHWAY SPEEDS DUE TO MAKE UP OF THE
         TIRE.  ADVISED THAT ENGINEERING WAS WORKING WITH FIRESTONE ON CONCERN.
TECH/C   11/22/1999 01:24PM SURVEY ENTRY         MSS - FCSD - TECH SVC HOTLINE
         I HAVE NOT BEEN GIVEN AUTHORIZATION FROM FACTORY REP TO REPL TIRES
REPAIR   02/11/2000 07:17PM EDWARD JUDE          MSS - FCSD - TECH SVC HOTLINE
         TECH STS CANT GET THIS TIRE SIZE IN GOOD YEAR.
RECOMM   ADV TO GET ANY OTHER BRAND

------------------------ C O N C E R N   D E T A I L S ----------------------

---------------- D I A G N O S T I C   I N F O R M A T I O N ----------------
Symp. Verif?:        Ease of Diagnosis:                Level of Assistance: El
Comp. Timing:        Base Timing       :               MIL light on?       :
Test Stand  :        Road Test         :               8D Number:
Prior Repair Attempts:                                 Repair Prior to Call: NO
DTCs KOEO:                                 KOEC:
     KOER:                                   CB:
Equipment/Procedure Used       Effective? Equipment/Procedure Used     Effective?

------------------------- S E R V I C E   A C T I O N S --------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

---------------------- V E H I C L E  D E T A I L S -------------------------
Vehicle Build Date:        07/28/1999    Warranty Start Date:        08/12/1999
```

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Page:  02                 \ CQIS DETAIL REPORT                    08/03/00 18:09:12

CQIS Report Number: XJYKB005  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 10/25/1999

Date of Sale:                08/12/1999     Selling Dlr (Mkt,Dlr,Sub):   07862
Dealer Special Order:                       Gross Vehicle Weight:        476 LBS
LH/RH Drive:
                             - - - E N G I N E - - -
Engine: 3.0L FFV ETHANOL - EFI              Tag: 9G           579 AA
Bld Dt:               Calb:   9LAMBAG A          Serial #:
                          - - - T R A N S M I S S I O N - - -
Trans: 5SP MAZDA R1                         Part #:
Bld Dt:                                      Serial #:
Model:                           Plt:                                  Shft:
                                - - - A X L E - - -
Axle:  2750# FORD 3.73 CONVE    Id Tag Code:              Bld Dt:
Serial #:                                                     Plt:
                          - - - A D D I T I O N A L - - -
Tire  : P225/70R15 SL ST BELT OWL A-S  Brand    :
Radio : ELETR  AM/FM STRO/DISC/CLK     A/C      : MANUAL AIR CONDITIONER
Paint :                                ---------

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller   : LARRY ANDERSON                      Title: SHOP FOREMAN

Rpair Dlr:   07749   - FUTURE FORD                       Ph#:(916) 969-3600
City:      Roseville                  State    : California
Country:  UNITED STATES               Region   : San Francisco - 72

Specialist's
Name        : JIM VEHIGE
---------------------- C Q I S   V I N   H I S T O R Y -----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY       ---

         SURVEY HAS BEEN RECEIVED

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
          Repair     Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID Date       Order  (Miles)   Nbr Cond. Pfx  Base     Sfx   Operation

~~07749     11/09/1999 337201      6678  1   28    BX       59          10654C~~
07749     11/09/1999 337201      6678  1   28                          10654C1
07749     01/27/2000 347247      6678  1   82    900    48079          MT1007
07749     01/27/2000 347247      6678  1   82            MISC
```

```
Page:  01                 \ CQIS DETAIL REPORT                   08/03/00 18:09:19

CQIS Report Number: XX3IG003  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 11/29/1999

------------------------- R E P O R T    S U M M A R Y ----------------------

VEHICLE:       1999 RANGER 4X2,REGCAB ,PICKUP        VIN      : [redacted]
Engine :            2.5L SOHC EFI                    Odometer:  17,058 MILES
Operating Environ:                                   WCC      :
Vehicle Use      :                                   Rsp. Act:

SYMPTOM: 3 06 1 00 CHASSIS                           TIRES/WHEELS
                   TIRE WEAR                         OTHER (CODE NOT AVAILABLE)
Additional Symptom: FRONT TIRE FEATHERING
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                        Feature:                    Loc:
Causal Condition:                                    Photo:       Images:  0
Component Test Status:                     ---- Return Loc:
Vehicle Fixed?:         Customer satisfied?:    Repair Effectiveness (%):

---------------------------------- C O M M E N T S ---------------------------
--TYPE-- ---------------------------- COMMENT TEXT ----------------------------
REPAIR   SF STS THAT THE FRONT TIRES ARE FEATHERING. STS THAT THE ALIGNMENT IS
         PERFECT AND THAT TIRE PRESSURE IS SET PROPERLY. STS THE FRONT END IS A
         LL TIGHT. SEEKING KNOWNS.
RECOMM   ADVISED THAT THE CONCERN IS UNDER INVESTIGATION BY BOTH FORD AND FIRES
         TONE. ADVISED THAT THERE IS NO FIX AT THIS TIME OTHER THAN MAKING SURE
          THE TIRES ARE ROTATED AT THE PROPER INTERVALS.

------------------------- C O N C E R N    D E T A I L S ----------------------

----------------- D I A G N O S T I C    I N F O R M A T I O N ----------------
Symp. Verif?:        Ease of Diagnosis:                   Level of Assistance: El
Comp. Timing:        Base Timing       :                  MIL light on?       :
Test Stand  :        Road Test         :                  8D Number:
Prior Repair Attempts:                                   Repair Prior to Call: NO
DTCs KOEO:                                 KOEC:
    KOER:                                    CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used      Effective?

--------------------------- S E R V I C E    A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

------------------------ V E H I C L E  D E T A I L S --------------------------
Vehicle Build Date:         08/21/1998     Warranty Start Date:          03/06/1999
Date of Sale:               03/06/1999     Selling Dlr (Mkt,Dlr,Sub):   02413
Dealer Special Order:                      Gross Vehicle Weight:         432 LBS
LH/RH Drive:
                            - - - E N G I N E - - -
Engine: 2.5L SOHC EFI                      Tag: 9G          195 AA
Bld Dt:               Calb:   9B1MAAA A        Serial #:
                      - - - T R A N S M I S S I O N - - -
Trans: 5SP MAZDA R1                        Part #:
Bld Dt:                                     Serial #:
Model:                               Plt:                              Shft:
                                - - - A X L E - - -
Axle:  2750# FORD 3.73 CONVE   Id Tag Code:             Bld Dt:
Serial #:                                                   Plt:
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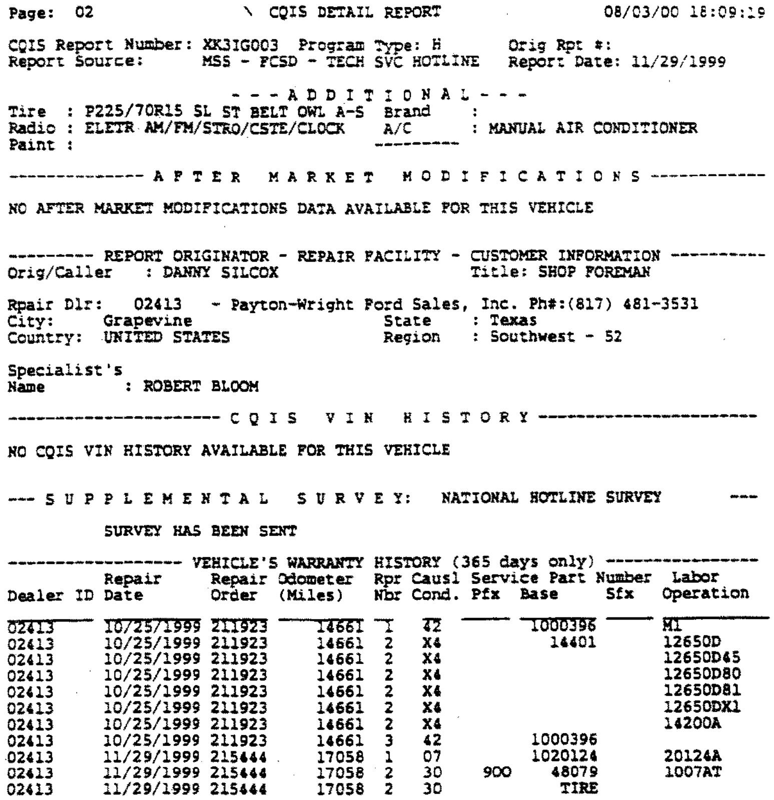
REDACTED



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Page:  02                \ CQIS DETAIL REPORT                 08/03/00 18:09:19

CQIS Report Number: XK3IG003  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 11/29/1999

                          - - - A D D I T I O N A L - - -
Tire  : P225/70R15 SL ST BELT OWL A-S  Brand    :
Radio : ELETR AM/FM/STRO/CSTE/CLOCK    A/C      : MANUAL AIR CONDITIONER
Paint :                               ---------

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : DANNY SILCOX                    Title: SHOP FOREMAN

Rpair Dlr:   02413   - Payton-Wright Ford Sales, Inc. Ph#:(817) 481-3531
City:     Grapevine                    State    : Texas
Country:  UNITED STATES                Region   : Southwest - 52

Specialist's
Name         : ROBERT BLOOM
---------------------- C Q I S   V I N   H I S T O R Y ----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY       ---

         SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------
         Repair     Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID Date       Order  (Miles)   Nbr Cond. Pfx  Base     Sfx   Operation
________ __________ ______ _________ ___ ____ _____ ________ ______ __________
02413    10/25/1999 211923     14661  1   42         1000396        M1
02413    10/25/1999 211923     14661  2   X4           14401        12650D
02413    10/25/1999 211923     14661  2   X4                        12650D45
02413    10/25/1999 211923     14661  2   X4                        12650D80
02413    10/25/1999 211923     14661  2   X4                        12650D81
02413    10/25/1999 211923     14661  2   X4                        12650DX1
02413    10/25/1999 211923     14661  2   X4                        14200A
02413    10/25/1999 211923     14661  3   42         1000396
02413    11/29/1999 215444     17058  1   07         1020124        20124A
02413    11/29/1999 215444     17058  2   30    900    48079        1007AT
02413    11/29/1999 215444     17058  2   30            TIRE
```

Page: 01 CQIS DETAIL REPORT 08/03/00 18:09:28

CQIS Report Number: YCGBD015 Program Type: H Orig Rpt #:
Report Source: MSS - FCSD - TECH SVC HOTLINE Report Date: 03/07/2000

REPORT SUMMARY

VEHICLE: 2000 RANGER 4X2,SUP CAB,PICKUP VIN : [redacted]
Engine : 3.0L FFV ETHANOL - EFI Odometer:
Operating Environ: WCC :
Vehicle Use : Rsp. Act:

SYMPTOM: 3 06 1 00 CHASSIS TIRES/WHEELS
TIRE WEAR OTHER (CODE NOT AVAILABLE)
Additional Symptom: TIRES FEATHERING
Other Veh. With Concern: Severity Rating - Customer: Engineering:

Causal Component:
Causal Factor: Feature: Loc:
Causal Condition: Photo: Images: 0
Component Test Status: ---- Return Loc:
Vehicle Fixed?: Customer satisfied?: Repair Effectiveness (%):

COMMENTS

--TYPE--	COMMENT TEXT
REPAIR	SF STS THAT THERE IS EXCESSIVE TIRE WEAR ON THE FRONT TIRES. STS THEY ARE FEATHERING. STS THAT TIRE PRESSURE IS FINE AND ALIGNMENT IS SET ALMOST PERFECT. SEEKING KNOWNS.
RECOMM	ADVISED SF THAT THERE IS AN INVESTIGATION INTO THE ISSUE. ADVISED THAT THEY MAY WANT TO DOUBLE CHECK THAT THE ALIGNMENT IS PERFECT. MAKE SURE THAT THE TIRES ARE ROTATED REGULARLY. NO OTHER KNOWNS AT THIS TIME.

CONCERN DETAILS

DIAGNOSTIC INFORMATION

Symp. Verif?: Ease of Diagnosis: Level of Assistance: E1
Comp. Timing: Base Timing : MIL light on? :
Test Stand : Road Test : 8D Number:
Prior Repair Attempts: Repair Prior to Call: NO
DTCs KOEO: KOEC:
KOER: CB:
Equipment/Procedure Used Effective? Equipment/Procedure Used Effective?

SERVICE ACTIONS

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

VEHICLE DETAILS

Vehicle Build Date: 12/10/1999 Warranty Start Date: 02/11/2000
Date of Sale: 02/11/2000 ~~Selling Dlr (Mkt,Dlr,Sub):~~ 04545
~~Dealer Special Order:~~ Gross Vehicle Weight:
LH/RH Drive:

--- ENGINE ---
Engine: 3.0L FFV ETHANOL - EFI Tag: 0G 578 AA
Bld Dt: Calb: 9LAAAHJ A Serial #:

--- TRANSMISSION ---
Trans: 4R44E 4SP AUTO Part #:
Bld Dt: Serial #:
Model: Plt: Shft:

--- AXLE ---
Axle: 2750# FORD 3.73 CONVE Id Tag Code: Bld Dt:
Serial #: Plt:

Tire 225/70 R15

REDACTED

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Page:  02                    CQIS DETAIL REPORT                 08/03/00 18:09:25
                               \
CQIS Report Number: YCGBD015  Program Type: H          Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE     Report Date: 03/07/2000

                         - - - A D D I T I O N A L - - -
Tire  : P225/70R15 SL ST BELT OWL A-S  Brand    :
Radio : ELETR  AM/FM STRO/DISC/CLK     A/C      : MANUAL AIR CONDITIONER
Paint : BLUE-GREEN EXT PAINT FAMILY   ---------  AMAZON GREEN PEARL CLEAR COAT

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller   : ROLAND CUEVAS                     Title: SHOP FOREMAN

Rpair Dlr:   04545   - Gillespie Ford                   Ph#:(210) 509-1000
City:      San Antonio                  State    : Texas
Country:  UNITED STATES                 Region   : Southwest - 52

Specialist's
Name        : ROBERT BLOOM

---------------------- C Q I S   V I N   H I S T O R Y -----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:  NATIONAL HOTLINE SURVEY        ---

         SURVEY HAS BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) -----------------
          Repair     Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID Date       Order  (Miles)   Nbr Cond. Pfx  Base      Sfx   Operation

04545     02/29/2000 027068       365  1   41    P5T  14N089 B       15650E
04545     02/29/2000 027068       365  1   41                        15650E1
04545     02/29/2000 027068       365  1   41                        15650E5
04545     02/29/2000 027068       365  1   41                        15650E20
04545     02/29/2000 027068       365  1   41                        15650E24
04545     02/29/2000 027068       365  1   41                        MT14N089
04545     03/07/2000 027696       485  1   D9    YL5      1015 BA    MT1007D3T
04545     03/07/2000 027696       485  1   D9    F87      4234 AD    MT1007D
04545     03/07/2000 027696       485  1   D9              OSP       MT1007D1
04545     03/07/2000 027696       485  1   D9                        MTRUNOUTSET
04545     03/10/2000 028081       486  1   D4    F87      4234 AD    MT4234
04545     03/10/2000 028081       486  1   D4     X      80W90 QL
04545     03/10/2000 028081       486  1   D4    F7A     19554 EA
04545     07/31/2000 041405      3471  1   D4        1303100         69000A
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04545     07/31/2000 041405      3471  1   D4                        20124A
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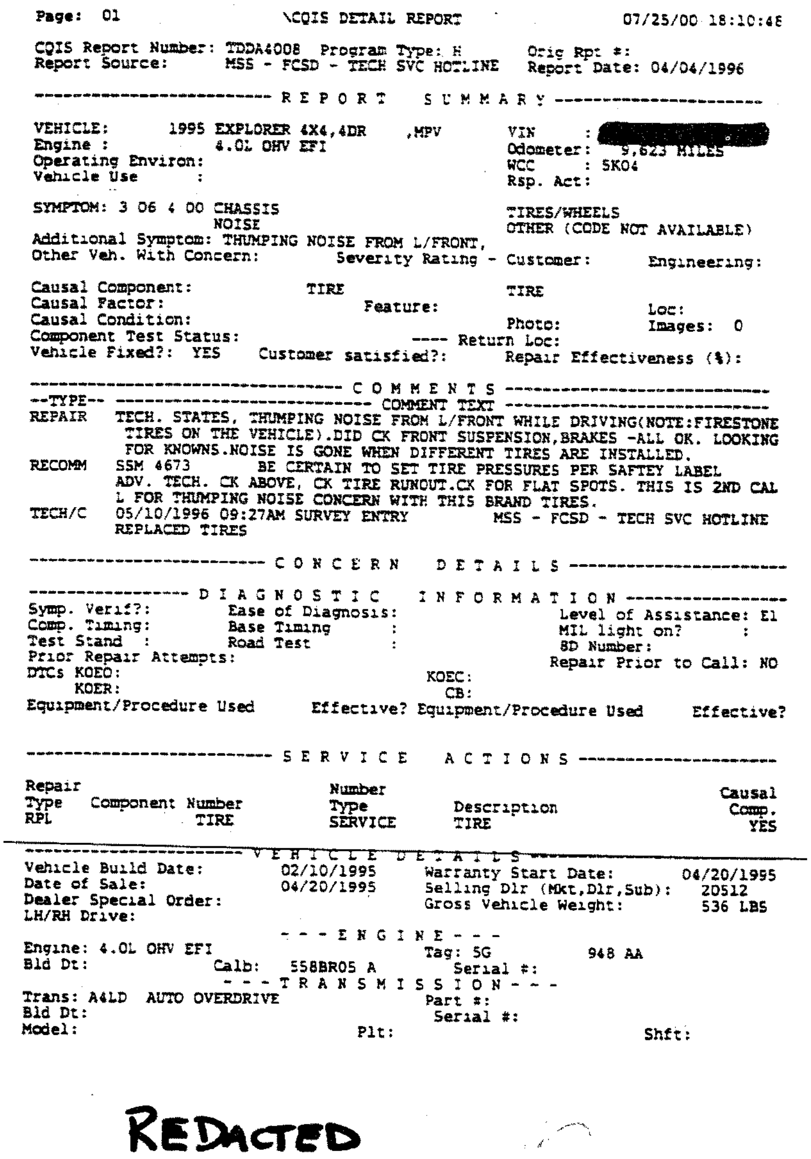

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Page:  01                  \CQIS DETAIL REPORT                     07/25/00 18:10:48

CQIS Report Number: TDDA4008  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 04/04/1996

------------------------ R E P O R T   S U M M A R Y ---------------------

VEHICLE:       1995 EXPLORER 4X4,4DR     ,MPV       VIN      : [redacted]
Engine :            4.0L OHV EFI                    Odometer:   9,623 MILES
Operating Environ:                                  WCC     : 5K04
Vehicle Use      :                                  Rsp. Act:

SYMPTOM: 3 06 4 00 CHASSIS                          TIRES/WHEELS
                   NOISE                            OTHER (CODE NOT AVAILABLE)
Additional Symptom: THUMPING NOISE FROM L/FRONT,
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:             TIRE                  TIRE
Causal Factor:                       Feature:                    Loc:
Causal Condition:                                   Photo:       Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:  YES    Customer satisfied?:      Repair Effectiveness (%):

------------------------------ C O M M E N T S ----------------------------
--TYPE-- ------------------------- COMMENT TEXT --------------------------
REPAIR   TECH. STATES, THUMPING NOISE FROM L/FRONT WHILE DRIVING(NOTE:FIRESTONE
          TIRES ON THE VEHICLE).DID CK FRONT SUSPENSION,BRAKES -ALL OK. LOOKING
          FOR KNOWNS.NOISE IS GONE WHEN DIFFERENT TIRES ARE INSTALLED.
RECOMM   SSM 4673      BE CERTAIN TO SET TIRE PRESSURES PER SAFTEY LABEL
         ADV. TECH. CK ABOVE, CK TIRE RUNOUT.CX FOR FLAT SPOTS. THIS IS 2ND CAL
         L FOR THUMPING NOISE CONCERN WITH THIS BRAND TIRES.
TECH/C   05/10/1996 09:27AM SURVEY ENTRY          MSS - FCSD - TECH SVC HOTLINE
         REPLACED TIRES

------------------------ C O N C E R N   D E T A I L S ----------------------

---------------- D I A G N O S T I C   I N F O R M A T I O N ----------------
Symp. Verif?:        Ease of Diagnosis:                  Level of Assistance: E1
Comp. Timing:        Base Timing      :                  MIL light on?       :
Test Stand  :        Road Test        :                  8D Number:
Prior Repair Attempts:                                 Repair Prior to Call: NO
DTCs KOEO:                                    KOEC:
     KOER:                                      CB:
Equipment/Procedure Used     Effective? Equipment/Procedure Used     Effective?

------------------------ S E R V I C E   A C T I O N S ---------------------

Repair                           Number                                  Causal
Type   Component Number          Type       Description                   Comp.
RPL                TIRE          SERVICE    TIRE                            YES
--------------------- V E H I C L E   D E T A I L S --------------------------
Vehicle Build Date:          02/10/1995   Warranty Start Date:         04/20/1995
Date of Sale:                04/20/1995   Selling Dlr (Mkt,Dlr,Sub):    20512
Dealer Special Order:                     Gross Vehicle Weight:         536 LBS
LH/RH Drive:
                            - - - E N G I N E - - -
Engine: 4.0L OHV EFI                      Tag: 5G          948 AA
Bld Dt:              Calb:   558BR05 A      Serial #:
                    - - - T R A N S M I S S I O N - - -
Trans: A4LD  AUTO OVERDRIVE               Part #:
Bld Dt:                                    Serial #:
Model:                           Plt:                            Shft:
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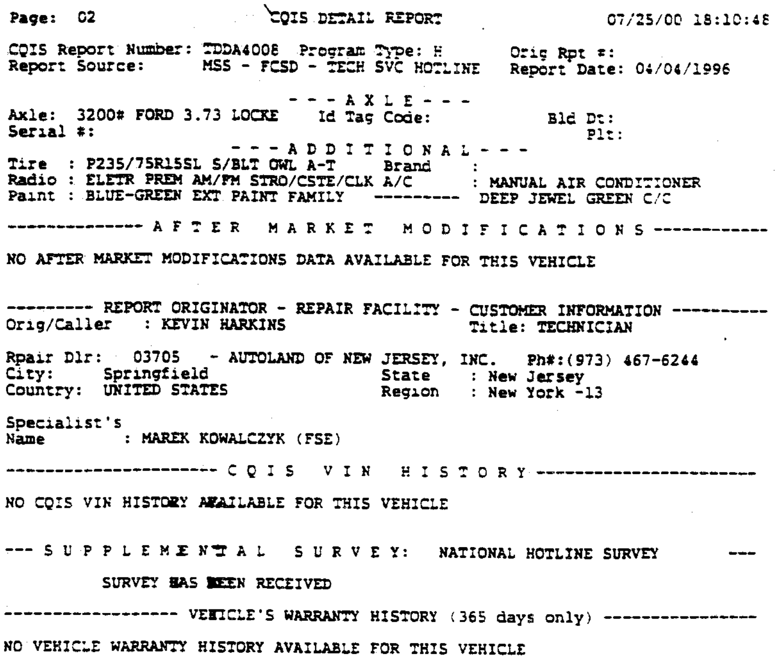
REDACTED



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Page:  02                    CQIS DETAIL REPORT                  07/25/00 18:10:48

CQIS Report Number: TDDA4008  Program Type: H          Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE      Report Date: 04/04/1996

                                 - - - A X L E - - -
Axle:  3200# FORD 3.73 LOCKE    Id Tag Code:              Bld Dt:
Serial #:                                                     Plt:
                           - - - A D D I T I O N A L - - -
Tire  : P235/75R15SL S/BLT OWL A-T     Brand     :
Radio : ELETR PREM AM/FM STRO/CSTE/CLK A/C       : MANUAL AIR CONDITIONER
Paint : BLUE-GREEN EXT PAINT FAMILY   ---------  DEEP JEWEL GREEN C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : KEVIN HARKINS                        Title: TECHNICIAN

Rpair Dlr:   03705    - AUTOLAND OF NEW JERSEY, INC.   Ph#:(973) 467-6244
City:      Springfield                  State    : New Jersey
Country:  UNITED STATES                 Region   : New York -13

Specialist's
Name         : MAREK KOWALCZYK (FSE)

---------------------- C Q I S   V I N   H I S T O R Y -----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY       ---

          SURVEY HAS BEEN RECEIVED

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------

NO VEHICLE WARRANTY HISTORY AVAILABLE FOR THIS VEHICLE
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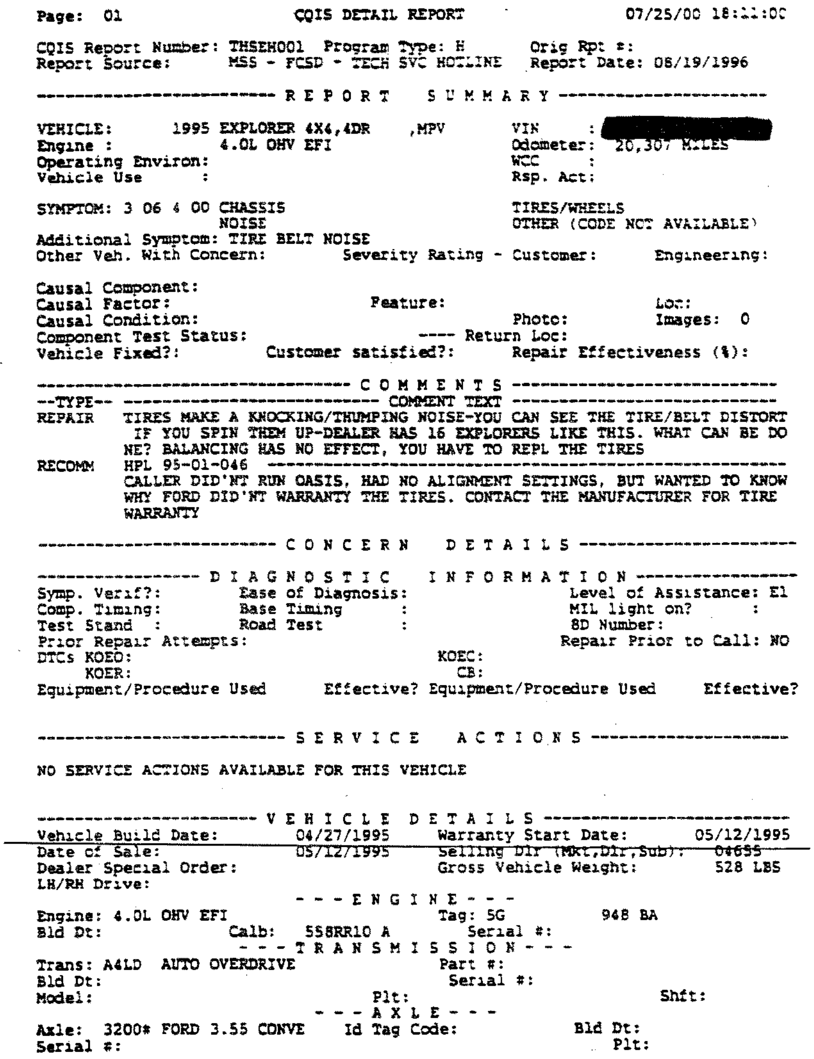

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Page:  01                    CQIS DETAIL REPORT                07/25/00 18:11:00

CQIS Report Number: THSEH001  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE    Report Date: 06/19/1996

------------------------- R E P O R T   S U M M A R Y -----------------------

VEHICLE:      1995 EXPLORER 4X4,4DR    ,MPV         VIN      : [redacted]
Engine :            4.0L OHV EFI                    Odometer:  20,307 MILES
Operating Environ:                                  WCC      :
Vehicle Use      :                                  Rsp. Act:

SYMPTOM: 3 06 4 00 CHASSIS                          TIRES/WHEELS
                   NOISE                            OTHER (CODE NOT AVAILABLE)
Additional Symptom: TIRE BELT NOISE
Other Veh. With Concern:       Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                    Feature:                      Loc:
Causal Condition:                                   Photo:      Images:  0
Component Test Status:                   ---- Return Loc:
Vehicle Fixed?:         Customer satisfied?:    Repair Effectiveness (%):

--------------------------------- C O M M E N T S ----------------------------
--TYPE-- ---------------------------- COMMENT TEXT ----------------------------
REPAIR   TIRES MAKE A KNOCKING/THUMPING NOISE-YOU CAN SEE THE TIRE/BELT DISTORT
          IF YOU SPIN THEM UP-DEALER HAS 16 EXPLORERS LIKE THIS. WHAT CAN BE DO
         NE? BALANCING HAS NO EFFECT, YOU HAVE TO REPL THE TIRES
RECOMM   HPL 95-01-046 ---------------------------------------------------------
         CALLER DID'NT RUN OASIS, HAD NO ALIGNMENT SETTINGS, BUT WANTED TO KNOW
         WHY FORD DID'NT WARRANTY THE TIRES. CONTACT THE MANUFACTURER FOR TIRE
         WARRANTY

------------------------- C O N C E R N   D E T A I L S ----------------------

----------------- D I A G N O S T I C   I N F O R M A T I O N ----------------
Symp. Verif?:         Ease of Diagnosis:                 Level of Assistance: E1
Comp. Timing:         Base Timing        :               MIL light on?      :
Test Stand  :         Road Test          :               8D Number:
Prior Repair Attempts:                                  Repair Prior to Call: NO
DTCs KOEO:                                  KOEC:
     KOER:                                    CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used     Effective?


-------------------------- S E R V I C E   A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE


----------------------- V E H I C L E   D E T A I L S -------------------------
Vehicle Build Date:          04/27/1995    Warranty Start Date:        05/12/1995
Date of Sale:                05/12/1995    Selling Dlr (Mkt,Dlr,Sub):  04655
Dealer Special Order:                      Gross Vehicle Weight:       528 LBS
LH/RH Drive:
                               - - - E N G I N E - - -
Engine: 4.0L OHV EFI                       Tag: 5G          948 BA
Bld Dt:              Calb:   558RR10 A        Serial #:
                         - - - T R A N S M I S S I O N - - -
Trans: A4LD  AUTO OVERDRIVE                Part #:
Bld Dt:                                     Serial #:
Model:                           Plt:                                 Shft:
                                 - - - A X L E - - -
Axle:  3200# FORD 3.55 CONVE   Id Tag Code:            Bld Dt:
Serial #:                                                 Plt:
```

REDACTED

```
Page:  02                    CQIS DETAIL REPORT                    07/25/00 18:11:00

CQIS Report Number: THSEH001  Program Type: H         Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 08/19/1996

                         - - - ADDITIONAL - - -
Tire  : P235/75R15SL S/BLT OWL A-T     Brand    :
Radio : ELETR PREM AM/FM STRO/CSTE/CLK A/C      : MANUAL AIR CONDITIONER
Paint : PURPLE-BLUE EXT PAINT FAMILY A---------  LAPIS C/C

-------------- AFTER  MARKET  MODIFICATIONS ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


--------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller   : NEAL AVELLINO                      Title: SERVICE MANAGER

Rpair Dlr:   03603   - Colonial Ford                      Ph#:(203) 748-3503
City:      Danbury                        State    : Connecticut
Country:   UNITED STATES                  Region   : New York -13

Specialist's
Name          : JEFF DELONGE

---------------------- CQIS  VIN  HISTORY ----------------------

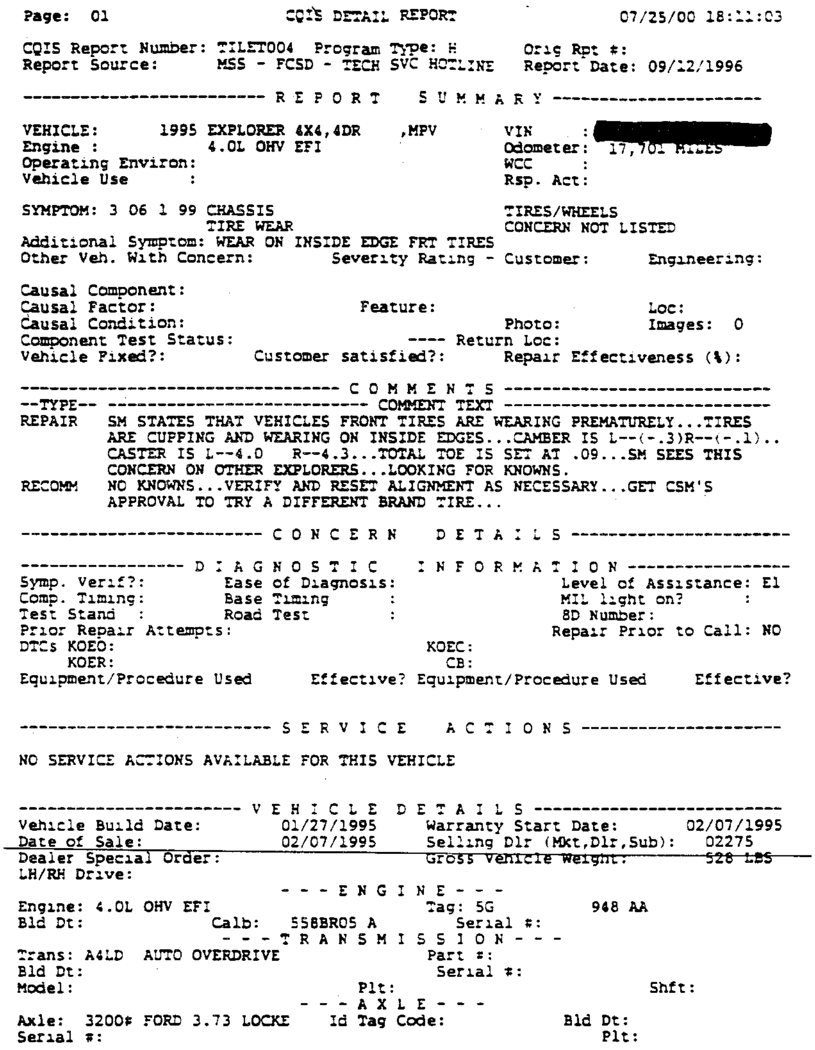
NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- SUPPLEMENTAL  SURVEY:  NATIONAL HOTLINE SURVEY        ---

         SURVEY HAS NOT BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------

NO.VEHICLE WARRANTY HISTORY AVAILABLE FOR THIS VEHICLE
```



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Page:  01                    CQIS DETAIL REPORT                 07/25/00 18:11:03

CQIS Report Number: TILET004  Program Type: H        Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 09/12/1996

------------------------- R E P O R T    S U M M A R Y ----------------------

VEHICLE:        1995 EXPLORER 4X4,4DR     ,MPV       VIN      : [redacted]
Engine :             4.0L OHV EFI                    Odometer:  17,701 MILES
Operating Environ:                                   WCC      :
Vehicle Use       :                                  Rsp. Act:

SYMPTOM: 3 06 1 99 CHASSIS                           TIRES/WHEELS
                   TIRE WEAR                         CONCERN NOT LISTED
Additional Symptom: WEAR ON INSIDE EDGE FRT TIRES
Other Veh. With Concern:        Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                        Feature:                    Loc:
Causal Condition:                                    Photo:       Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:        Customer satisfied?:     Repair Effectiveness (%):

---------------------------------- C O M M E N T S ----------------------------
--TYPE-- ---------------------------- COMMENT TEXT ----------------------------
REPAIR   SM STATES THAT VEHICLES FRONT TIRES ARE WEARING PREMATURELY...TIRES
         ARE CUPPING AND WEARING ON INSIDE EDGES...CAMBER IS L--(-.3)R--(-.1)..
         CASTER IS L--4.0   R--4.3...TOTAL TOE IS SET AT .09...SM SEES THIS
         CONCERN ON OTHER EXPLORERS...LOOKING FOR KNOWNS.
RECOMM   NO KNOWNS...VERIFY AND RESET ALIGNMENT AS NECESSARY...GET CSM'S
         APPROVAL TO TRY A DIFFERENT BRAND TIRE...

------------------------- C O N C E R N    D E T A I L S ----------------------

----------------- D I A G N O S T I C    I N F O R M A T I O N ----------------
Symp. Verif?:        Ease of Diagnosis:                 Level of Assistance: E1
Comp. Timing:        Base Timing      :                 MIL light on?       :
Test Stand  :        Road Test        :                  8D Number:
Prior Repair Attempts:                                 Repair Prior to Call: NO
DTCs KOEO:                                  KOEC:
     KOER:                                    CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used     Effective?


-------------------------- S E R V I C E    A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE


------------------------ V E H I C L E  D E T A I L S --------------------------
Vehicle Build Date:         01/27/1995    Warranty Start Date:         02/07/1995
Date of Sale:               02/07/1995    Selling Dlr (Mkt,Dlr,Sub):   02275
Dealer Special Order:                     Gross Vehicle Weight:        528 LBS
LH/RH Drive:
                          - - - E N G I N E - - -
Engine: 4.0L OHV EFI                      Tag: 5G            948 AA
Bld Dt:               Calb:   558BROS A       Serial #:
                       - - - T R A N S M I S S I O N - - -
Trans: A4LD  AUTO OVERDRIVE               Part #:
Bld Dt:                                    Serial #:
Model:                          Plt:                                  Shft:
                            - - - A X L E - - -
Axle:  3200# FORD 3.73 LOCKE    Id Tag Code:              Bld Dt:
Serial #:                                                     Plt:
```

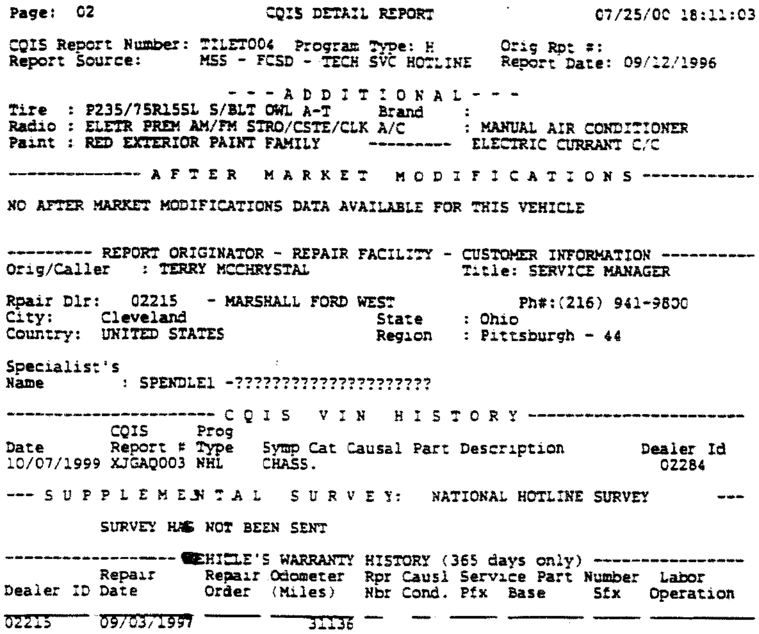

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Page:  02                    CQIS DETAIL REPORT                07/25/00 18:11:03

CQIS Report Number: TILET004  Program Type: H       Orig Rpt #:
Report Source:      MSS - FCSD - TECH SVC HOTLINE   Report Date: 09/12/1996

                          - - - A D D I T I O N A L - - -
Tire  : P235/75R15SL S/BLT OWL A-T     Brand     :
Radio : ELETR PREM AM/FM STRO/CSTE/CLK A/C       : MANUAL AIR CONDITIONER
Paint : RED EXTERIOR PAINT FAMILY      ---------  ELECTRIC CURRANT C/C

--------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


---------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : TERRY MCCHRYSTAL                 Title: SERVICE MANAGER

Rpair Dlr:   02215   - MARSHALL FORD WEST               Ph#:(216) 941-9800
City:      Cleveland                      State     : Ohio
Country:   UNITED STATES                  Region    : Pittsburgh - 44

Specialist's
Name         : SPENDLE1 -?????????????????????

---------------------- C Q I S   V I N   H I S T O R Y ----------------------
             CQIS      Prog
Date         Report #  Type   Symp Cat Causal Part Description         Dealer Id
10/07/1999 XJGAQ003 NHL    CHASS.                                    02284

--- S U P P L E M E N T A L   S U R V E Y:   NATIONAL HOTLINE SURVEY        ---

         SURVEY HAS NOT BEEN SENT

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) -----------------
           Repair       Repair Odometer  Rpr Causl Service Part Number  Labor
Dealer ID  Date         Order  (Miles)   Nbr Cond. Pfx   Base   Sfx   Operation

02215      09/03/1997            31136
```

```
Page:  01                  CQIS DETAIL REPORT                 07/25/00 18:12:15

CQIS Report Number: TH1AA546  Program Type: Q       Orig Rpt #:  101249-96
Report Source:      MSS - FCSD - QSFS                Report Date: 08/27/1996

------------------------ R E P O R T   S U M M A R Y ----------------------

VEHICLE:      1996 EXPLORER 4X2,4DR     ,MPV        VIN      : [redacted]
Engine :           4.0L OHV EFI                     Odometer:   9,395 MILES
Operating Environ:                                  WCC      :
Vehicle Use       :                                 Rsp. Act:

SYMPTOM: 3 06 7 05 CHASSIS                          TIRES/WHEELS
                   APPEARANCE                       DAMAGED
Additional Symptom:
Other Veh. With Concern:       Severity Rating - Customer:      Engineering:

Causal Component:
Causal Factor:                       Feature:                     Loc:
Causal Condition:                                   Photo:        Images:  0
Component Test Status:                    ---- Return Loc:
Vehicle Fixed?:        Customer satisfied?:         Repair Effectiveness (%):

-------------------------------- C O M M E N T S ---------------------------
--TYPE-- -------------------------- COMMENT TEXT ---------------------------
CONCER   THERE IS A VIBRATION WHILE DRIVING.
REPAIR   TIRES WERE CUPPED AND FLARED. THE CUSTOMER HAS ROTATED TIRES AT 5,000
         MILES. INSPECTED VEHICLE NPF GOODYEAR WRANGLER TIRES. NOW SEVENTH
         COMPLANT AT THIS DEALER ON GOODYEAR WRANGLER TIRES.
AUDIT    08/29/1996 10:00AM LADAMS5
         SYMPTOM    3 06 0 00       CHANGED TO 3 06 7 05        BY LADAMS5

------------------------ C O N C E R N   D E T A I L S ----------------------

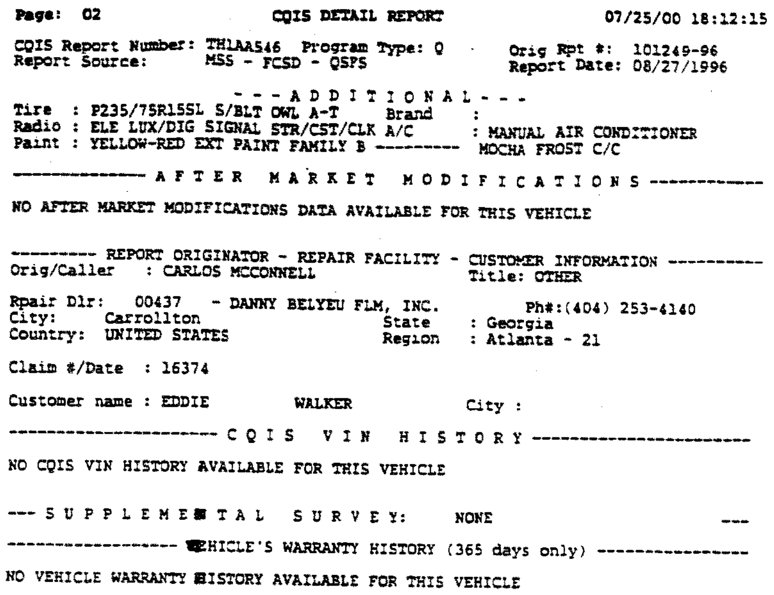
---------------- D I A G N O S T I C   I N F O R M A T I O N ----------------
Symp. Verif?:        Ease of Diagnosis:                Level of Assistance:
Comp. Timing:        Base Timing      :                MIL light on?      :
Test Stand  :        Road Test        :                8D Number:
Prior Repair Attempts:                                Repair Prior to Call: NO
DTCs KOEO:                                KOEC:
     KOER:                                  CB:
Equipment/Procedure Used      Effective? Equipment/Procedure Used     Effective?

------------------------- S E R V I C E   A C T I O N S ---------------------

NO SERVICE ACTIONS AVAILABLE FOR THIS VEHICLE

---------------------- V E H I C L E  D E T A I L S -------------------------
Vehicle Build Date:        08/25/1995    Warranty Start Date:        10/04/1995
Date of Sale:              10/04/1995    Selling Dlr (Mkt,Dlr,Sub):   00437
Dealer Special Order:                    Gross Vehicle Weight:
LH/RH Drive:
                           - - - E N G I N E - - -
Engine: 4.0L OHV EFI                     Tag: 6G            948 AA
Bld Dt:              Calb:   658BR05 A      Serial #:
                         - - - T R A N S M I S S I O N - - -
Trans: A4LDE O/D (4R44/55E)              Part #:
Bld Dt:                                   Serial #:
Model:                          Plt:                                Shft:
                              - - - A X L E - - -
Axle:  3200# FORD 3.73 LOCKE    Id Tag Code:            Bld Dt:
Serial #:                                                   Plt:
```

REDACTED



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Page:  02                   CQIS DETAIL REPORT                 07/25/00 18:12:15

CQIS Report Number: TH1AA546  Program Type: Q     Orig Rpt #:  101249-96
Report Source:      MSS - FCSD - QSPS             Report Date: 08/27/1996

                        - - - A D D I T I O N A L - - -
Tire  : P235/75R15SL S/BLT OWL A-T     Brand    :
Radio : ELE LUX/DIG SIGNAL STR/CST/CLK A/C      : MANUAL AIR CONDITIONER
Paint : YELLOW-RED EXT PAINT FAMILY B ---------  MOCHA FROST C/C

-------------- A F T E R   M A R K E T   M O D I F I C A T I O N S ------------

NO AFTER MARKET MODIFICATIONS DATA AVAILABLE FOR THIS VEHICLE


---------- REPORT ORIGINATOR - REPAIR FACILITY - CUSTOMER INFORMATION ----------
Orig/Caller    : CARLOS MCCONNELL                  Title: OTHER

Rpair Dlr:   00437   - DANNY BELYEU FLM, INC.          Ph#:(404) 253-4140
City:     Carrollton                      State    : Georgia
Country:  UNITED STATES                   Region   : Atlanta - 21

Claim #/Date  : 16374

Customer name : EDDIE         WALKER             City :

---------------------- C Q I S   V I N   H I S T O R Y -----------------------

NO CQIS VIN HISTORY AVAILABLE FOR THIS VEHICLE


--- S U P P L E M E N T A L   S U R V E Y:    NONE                          ---

------------------ VEHICLE'S WARRANTY HISTORY (365 days only) ----------------

NO VEHICLE WARRANTY HISTORY AVAILABLE FOR THIS VEHICLE
```

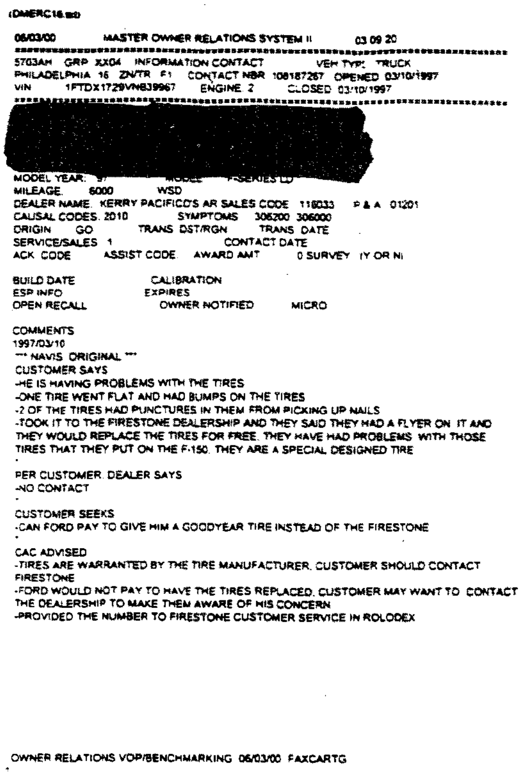

```
(DMERC16.ad)
06/03/00          MASTER OWNER RELATIONS SYSTEM II          03 09 20
==========================================================================
5703AM   GRP  XX04   INFORMATION CONTACT            VEH TYP:  TRUCK
PHILADELPHIA  16  ZN/TR  F1    CONTACT NBR  108187267  OPENED 03/10/1997
VIN        1FTDX1729VNB39967      ENGINE  2       CLOSED  03/10/1997
==========================================================================
[redacted]
MODEL YEAR:
MILEAGE.      6000          WSD
DEALER NAME.  KERRY PACIFICO'S AR SALES CODE  118033     P & A   01201
CAUSAL CODES. 2010             SYMPTOMS     306200  306000
ORIGIN      GO         TRANS  DST/RGN       TRANS  DATE
SERVICE/SALES  1                       CONTACT DATE
ACK  CODE       ASSIST CODE    AWARD AMT         0 SURVEY  (Y OR N)

BUILD DATE                 CALIBRATION
ESP INFO                  EXPIRES
OPEN RECALL                  OWNER NOTIFIED         MICRO

COMMENTS
1997/03/10
*** NAVIS  ORIGINAL ***
CUSTOMER SAYS
-HE IS HAVING PROBLEMS WITH THE TIRES
-ONE TIRE WENT FLAT AND HAD BUMPS ON THE TIRES
-2 OF THE TIRES HAD PUNCTURES IN THEM FROM PICKING UP NAILS
-TOOK IT TO THE FIRESTONE DEALERSHIP AND THEY SAID THEY HAD A FLYER ON  IT AND
THEY WOULD REPLACE THE TIRES FOR FREE. THEY HAVE HAD PROBLEMS  WITH THOSE
TIRES THAT THEY PUT ON THE F-150. THEY ARE A SPECIAL DESIGNED TIRE
*
PER CUSTOMER. DEALER SAYS
-NO CONTACT
*
CUSTOMER SEEKS
-CAN FORD PAY TO GIVE HIM A GOODYEAR TIRE INSTEAD OF THE FIRESTONE
*
CAC ADVISED
-TIRES ARE WARRANTED BY THE TIRE MANUFACTURER. CUSTOMER SHOULD CONTACT
FIRESTONE
-FORD WOULD NOT PAY TO HAVE THE TIRES REPLACED. CUSTOMER MAY WANT TO  CONTACT
THE DEALERSHIP TO MAKE THEM AWARE OF HIS CONCERN
-PROVIDED THE NUMBER TO FIRESTONE CUSTOMER SERVICE IN ROLODEX




OWNER RELATIONS VOP/BENCHMARKING  06/03/00  FAXCARTG
```

REDACTED

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(DMERC43 (rt)

06/05/2000        MASTER OWNER RELATIONS SYSTEM III        18 41 53
=========================================================================
               CONCERN ISSUE            CASE NBR 1506412648
REGION               ZONE.              OPENED 09/21/1998
VIN  1FMDU32P9TZA39179  ENGINE P  VEH.TYPE T     CLOSED 09/21/1998
=========================================================================
[redacted]
MODEL YEAR:  1996          MODEL.     U320 EXPLORER 4X2 4DR WAGON
MILEAGE     31300
DEALER NAME.                SALES CODE           P & A
REASON CODE  2010 WARRANTY - BUMPER-TO-BUMPER
SYMPTOMS     306300 TIRES/WHEELS REMOVAL OF
____________________________________________________
ORIGIN   CAC   - GENERAL CAC  COMMUNICATION  MAIL
ACTION   DR0004 - REQUEST CRM/SVC MGR TO CONTACT CUSTOMER
DOCUMENT         ANALYST: CROZARIO  CONSTANTINA ROZARIO
ACTION DATA/COMMENTS:

1998/09/21
 13.00.38  CUSTOMER SAYS   CUST SAYS HE LOVES HIS CAR  CUST SAYS THE F
       IRESTONE ATX TIRE DELAMINATED ON FRIDAY 18TH. 1998. AS A RES
       ULT THE BODY OF THE CAR WAS DAMAGED. CUST SAYS HE TOOK THE V
       EHICLE IN FOR SERVICE TWO WEEKS AGO  CUST INFORMED DLR THAT
       THE VEHICLE WAS PULLING TO THE RIGHT  DLR DID AN ALIGNMENT.
        ROTATED AND INSPECTED THE TIRES  WHEN CUST TOOK THE VEHICLE
        TO THE DLR.  HE FOUND THE DLRSHP VERY UNRESPONSIVE  THE SER
       VICE MANAGER. JEFF BODIE WAS VERY CONFRONTATIONAL AND UNRESP
       ONSIVE  HE TOLD CUST THAT IT WAS NOT THEIR PROBLEM AND ASKED
        CUST TO TAKE IT TO FIRESTONE  WHEN THE VEHICLE WAS TAKEN TO
        THE BODY SHOP  THE ESTIMATE WAS ABOUT $ 950 THE BODY SHOP M
       NGR TOLD CUST THAT THIS WAS A COMMON OCCURENCE WITH THIS TYP
       E OF FIRESTONE TIRES AND HE GET TWO TO THREE VEHICLES A WEEK
         FOR BODY DAMAGE DUE TO FIRESTONE TIRE DELAMINATION. CUST
       SAYS THIS IS AN EXTREME SAFETY HAZARD AND WANTS FORD TO BE A
       WARE OF THIS. CUST WANTS FORD TO REPAIR THE VEHICLE. AND REP
       LACE THE TIRES WITH ANOTHER BRAND. CUST WOULD LIKE FORD TO I
       NVESTIGATE THE SITUATION AND WOULD LIKE TO KNOW WHAT IS HAPP
       ENING ABOUT THE TIRE SAFETY   PER CUSTOMER. DEALER SAYS   D
       LR MR BODIE. SERV MNGR ADVISED CUST THAT THE GENERAL MNGR WA
       S ON SITE BUT WAS IN MEETINGS WITH CUSTS ALL DAY AND WOULD G
       ET BACK TO HIM   CAC ADVISED   - DEALERSHIP IS IN THE BEST
       POSITION TO DETERMINE WARRANTY COVERAGE  - STAY IN TOUCH WIT
       H CRM/SERV MGR INFERENCE CASE ID  4553
____________________________________________________
ORIGIN   CAC138 - US CONCERN CASE BASE  COMMUNICATION  MAIL
ACTION   139   - ADVISE CUST INFO WILL BE SENT TO DLR. CONTACT CRM
DOCUMENT         ANALYST  CROZARIO  CONSTANTINA ROZARIO
ACTION DATA/COMMENTS
       CUSTOMER SAYS   CUST SAYS HE LOVES HIS CAR  CUST SAYS THE F
       IRESTONE ATX TIRE DELAMINATED ON FRIDAY 18TH. 1998. AS A RES


OWNER RELATIONS            06/05/2000  MMFAXPRG
```

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06/05/2000        MASTER OWNER RELATIONS SYSTEM III        18 41 53
=========================================================================
               CONCERN ISSUE            CASE NBR 1506412648
REGION               ZONE.              OPENED 09/21/1998
VIN  1FMDU32P9TZA39179  ENGINE P  VEH TYPE T     CLOSED 09/21/1998
=========================================================================
1998/09/21
 13 00 38  ULT THE BODY OF THE CAR WAS DAMAGED  CUST SAYS HE TOOK THE V
       EHICLE IN FOR SERVICE TWO WEEKS AGO  CUST INFORMED DLR THAT
       THE VEHICLE WAS PULLING TO THE RIGHT  DLR DID AN ALIGNMENT
        ROTATED AND INSPECTED THE TIRES  WHEN CUST TOOK THE VEHICLE
        TO THE DLR  HE FOUND THE DLRSHP VERY UNRESPONSIVE  THE SER
       VICE MANAGER. JEFF BODIE WAS VERY CONFRONTATIONAL AND UNRESP
       ONSIVE  HE TOLD CUST THAT IT WAS NOT THEIR PROBLEM AND ASKED
        CUST TO TAKE IT TO FIRESTONE  WHEN THE VEHICLE WAS TAKEN TO
        THE BODY SHOP  THE ESTIMATE WAS ABOUT $ 950 THE BODY SHOP M
       NGR TOLD CUST THAT THIS WAS A COMMON OCCURENCE WITH THIS TYP
       E OF FIRESTONE TIRES AND HE GET TWO TO THREE VEHICLES A WEEK
         FOR BODY DAMAGE DUE TO FIRESTONE TIRE DELAMINATION  CUST
       SAYS THIS IS AN EXTREME SAFETY HAZARD AND WANTS FORD TO BE A
       WARE OF THIS  CUST WANTS FORD TO REPAIR THE VEHICLE  AND REP
       LACE THE TIRES WITH ANOTHER BRAND  CUST WOULD LIKE FORD TO I
       NVESTIGATE THE SITUATION AND WOULD LIKE TO KNOW WHAT IS HAPP
       ENING ABOUT THE TIRE SAFETY   PER CUSTOMER. DEALER SAYS   D
       LR MR BODIE. SERV MNGR ADVISED CUST THAT THE GENERAL MNGR WA
       S ON SITE BUT WAS IN MEETINGS WITH CUSTS ALL DAY AND WOULD G
       ET BACK TO HIM   CAC ADVISED   - DEALERSHIP IS IN THE BEST
       POSITION TO DETERMINE WARRANTY COVERAGE  - STAY IN TOUCH WIT
       H CRM/SERV MGR INFERENCE CASE ID  4553
____________________________________________________
```

REDACTED

1998 Master

REDACTED

REDACTED

REDACTED

REDACTED

REDACTED

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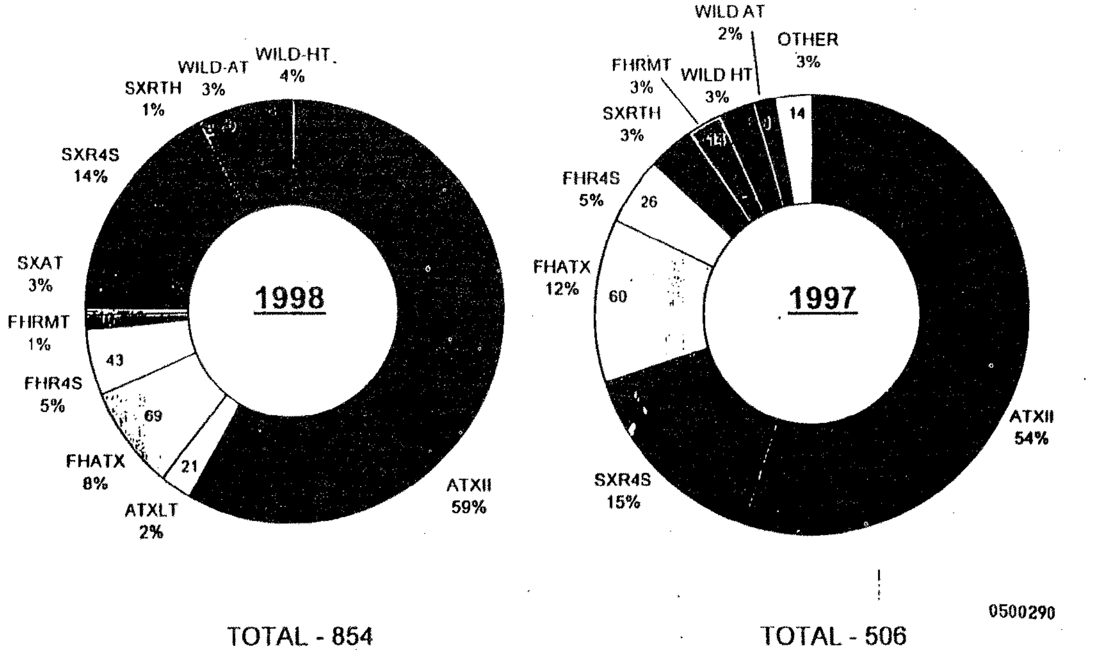
LT CLAIMS BY PATTERN (FIRESTONE)



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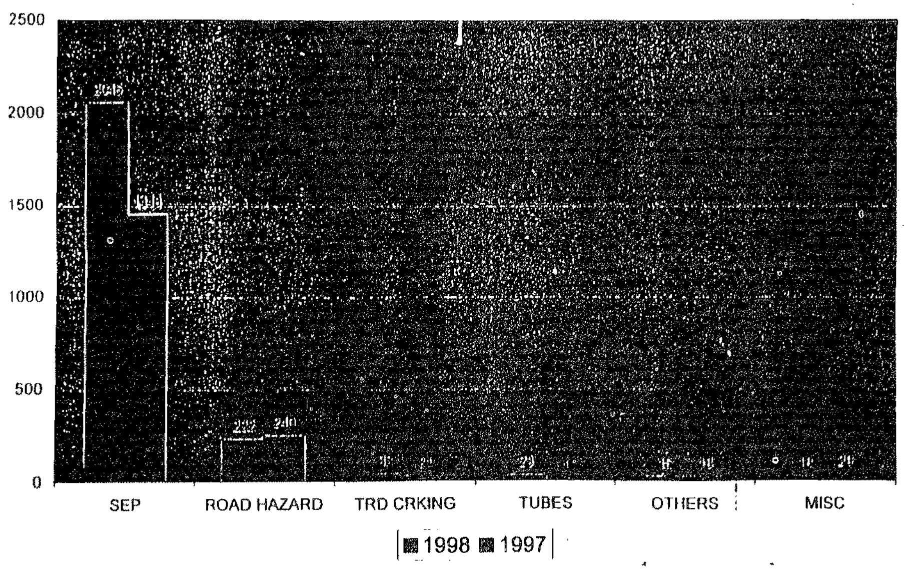
1998 SERVICE CONDITION GROUPS



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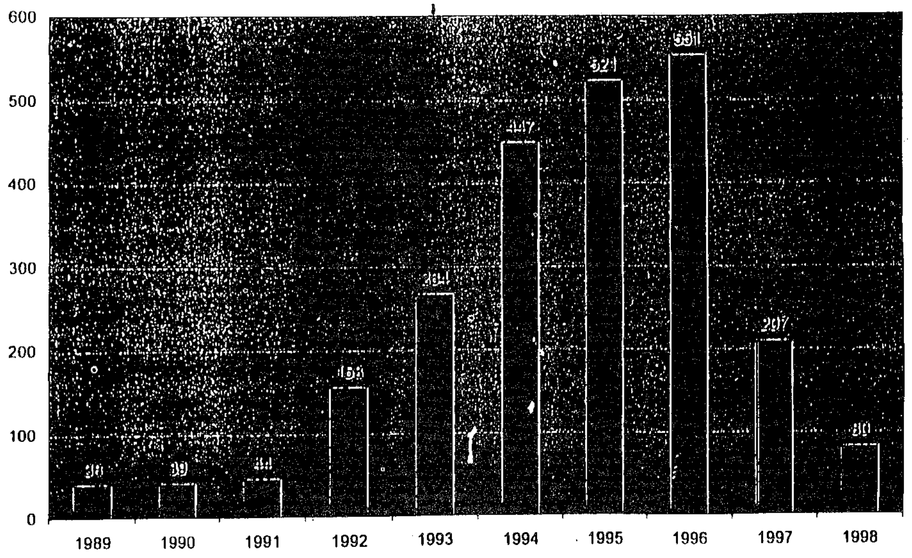
1998 Claims by Production Year



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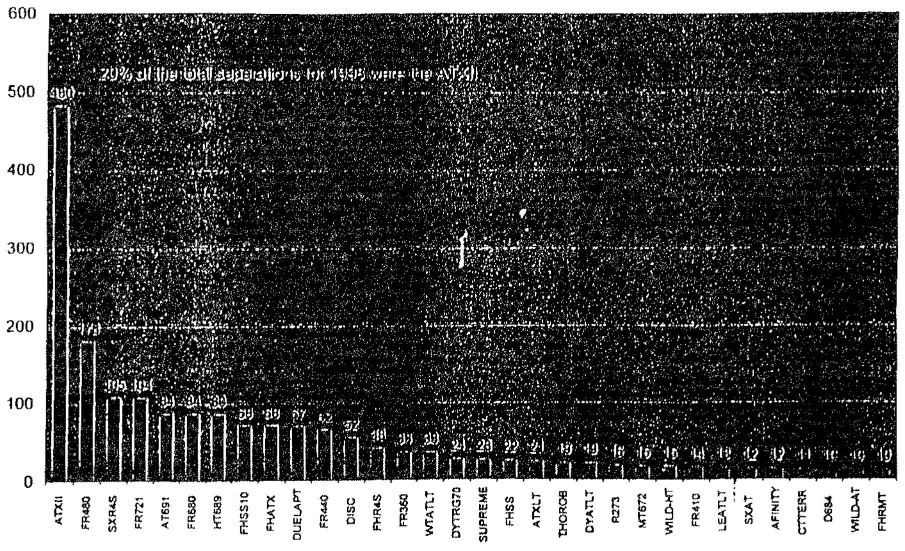
1998 Service Condition Group 01 (Seperations) by Pattern



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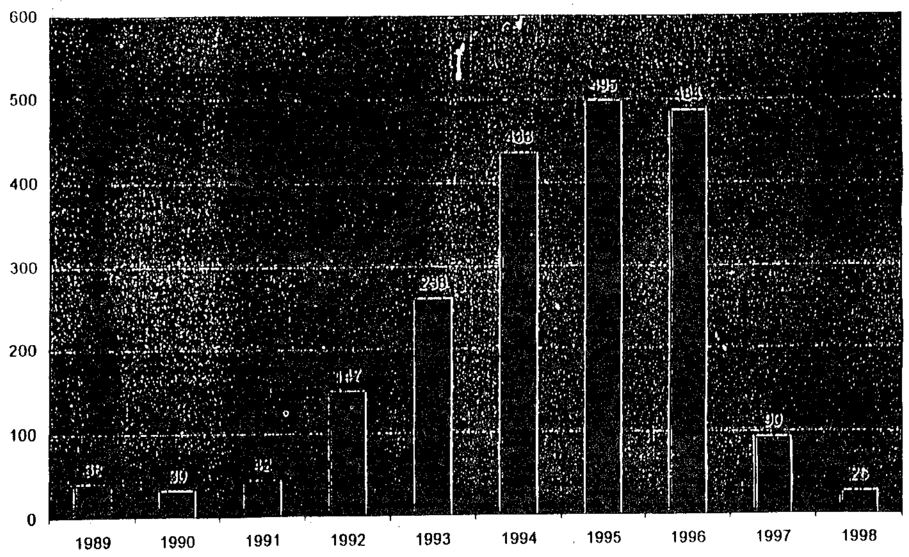
1998 Seperations by Production Year



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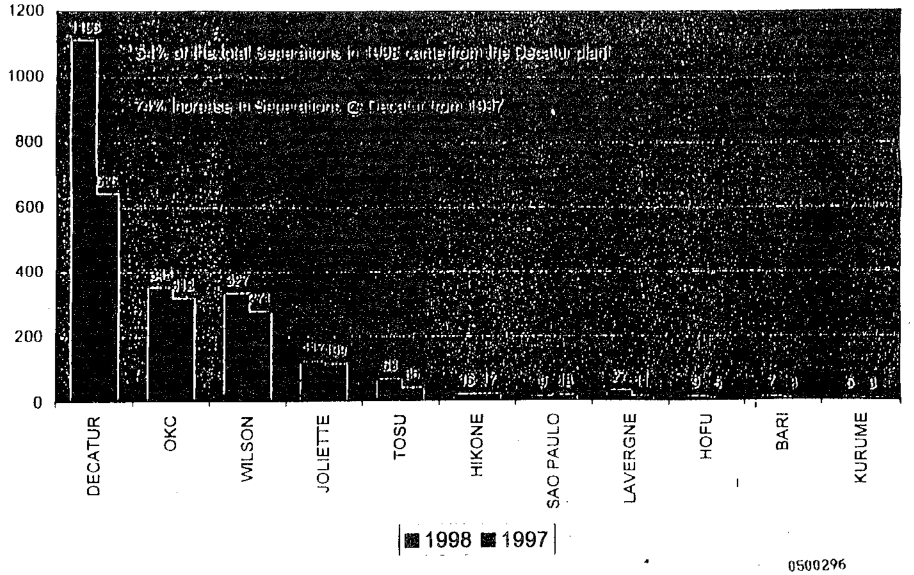
1998 Seperations by Plant



54% of the total Seperations in 1998 came from the Decatur plant

74% Increase in Seperations @ Decatur from 1997

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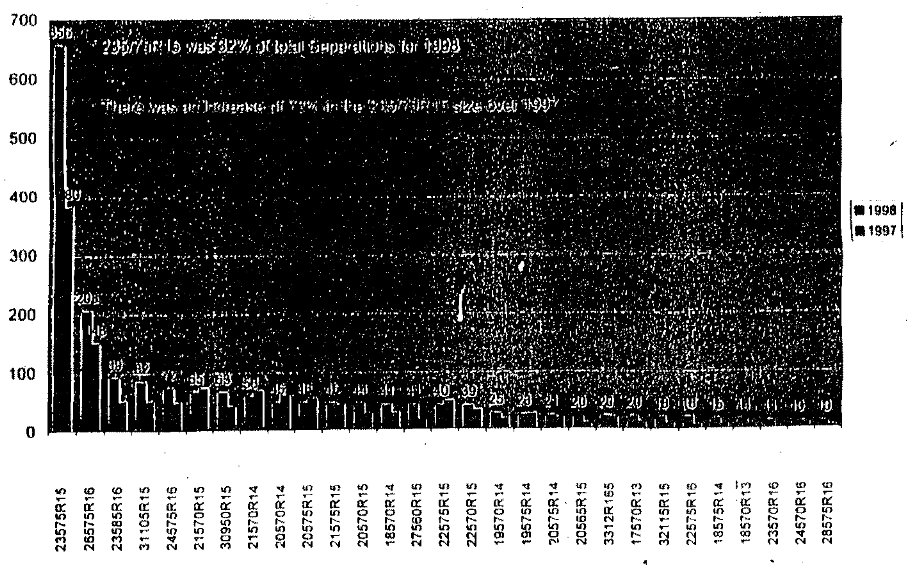
1998 Seperations by Size



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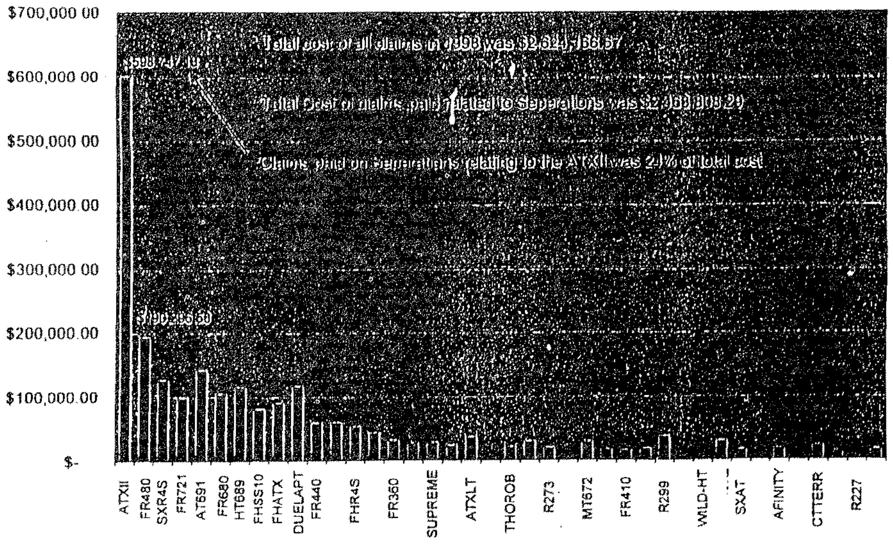
1998 Cost of Seperations by Pattern



Total cost of all claims in 1998 was $2,624,166.67

Total Cost of claims paid related to Seperations was $2,468,808.29

Claims paid on Seperations relating to the ATXII was 24% of total cost

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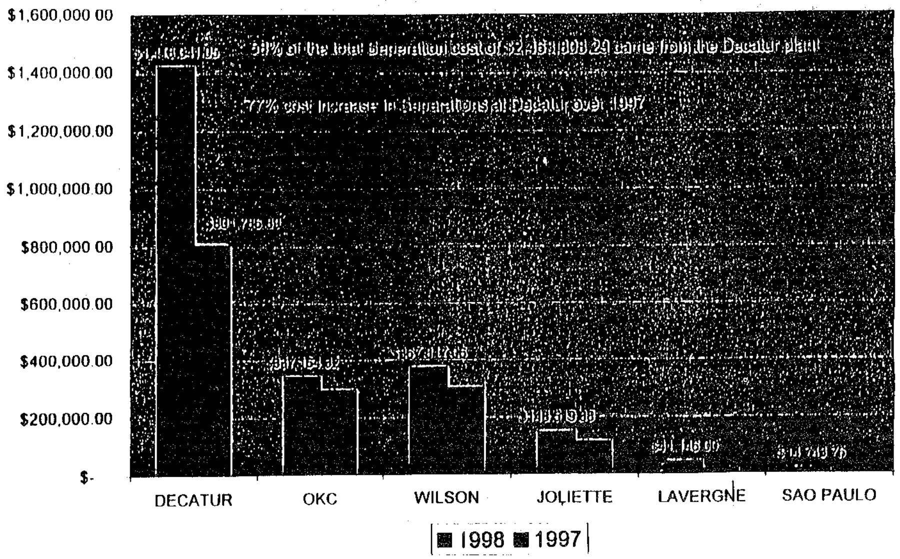
1998 Seperation Cost by Plant



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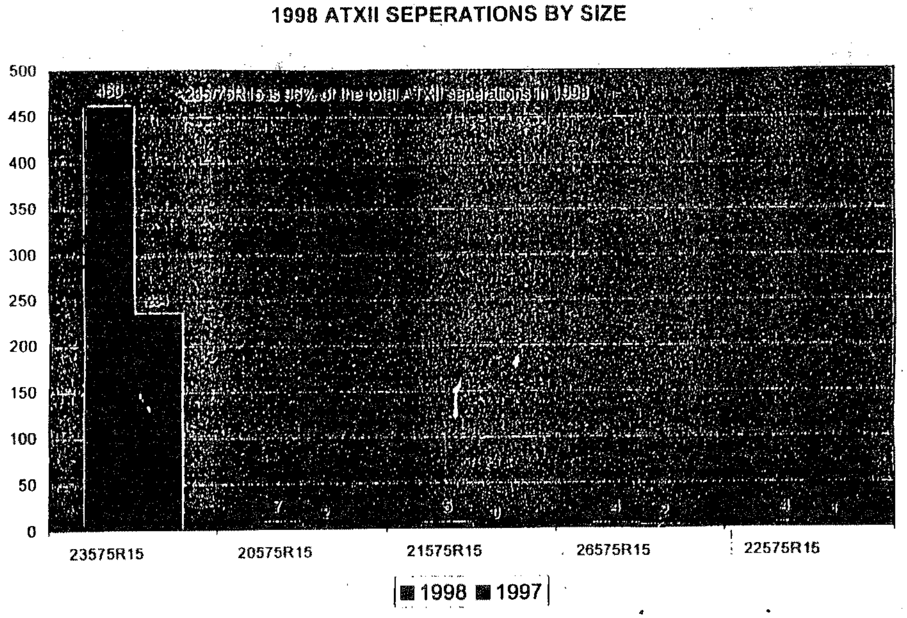

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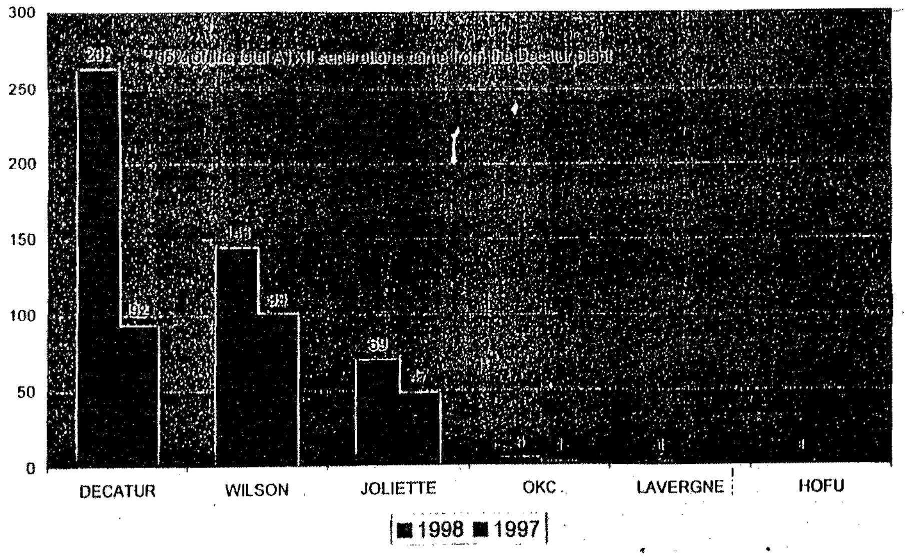
1998 ATXII Seperations by Plant



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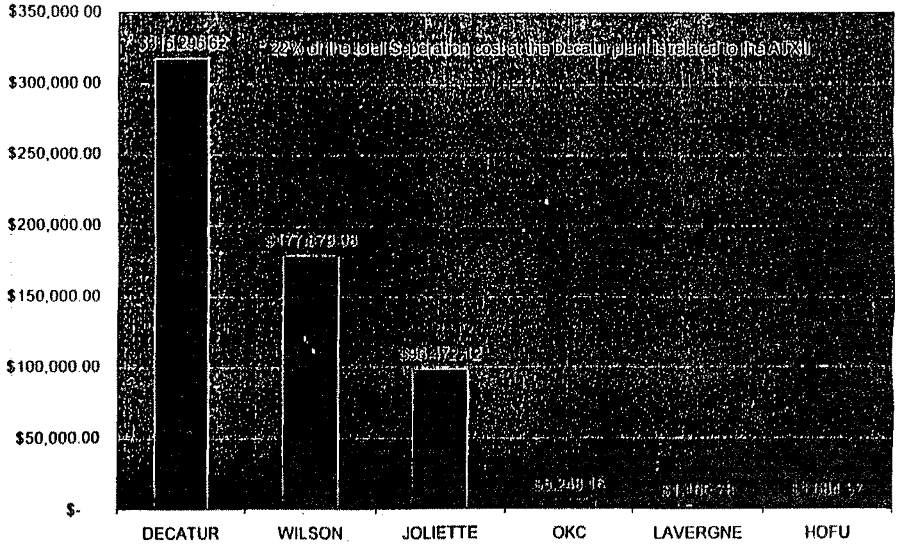
1998 Seperation Cost by Plant (ATXII only)



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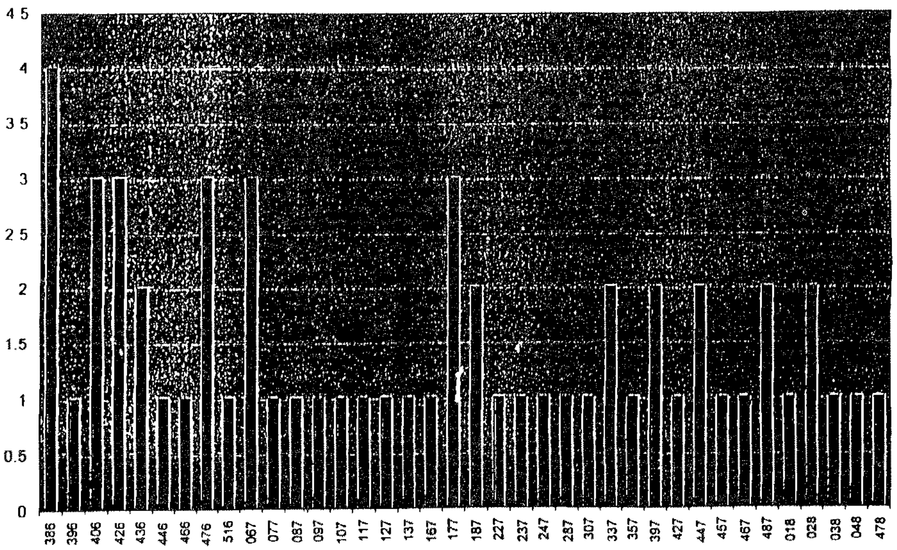
1998 Seperations after DOT "366" (without 265/75R16)



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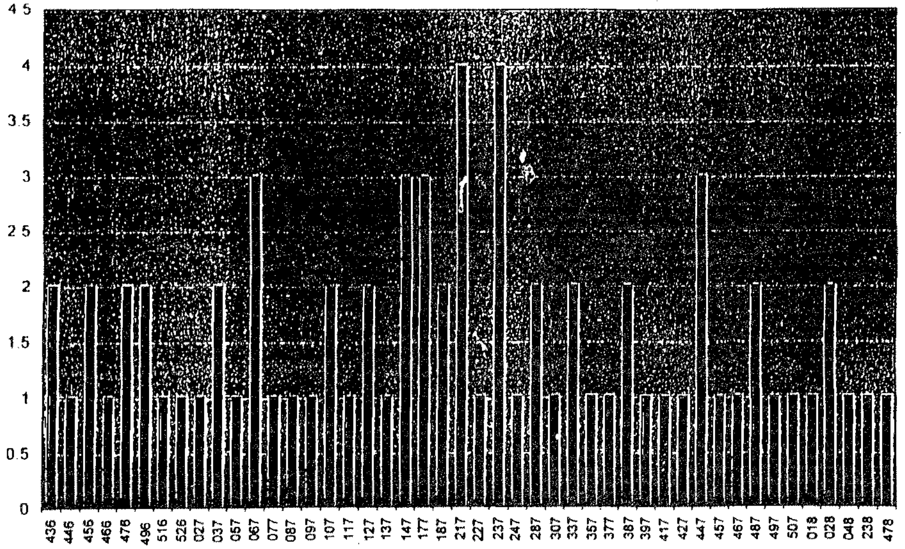
ENTIRE PAGE

1998 Seperations after DOT "426"



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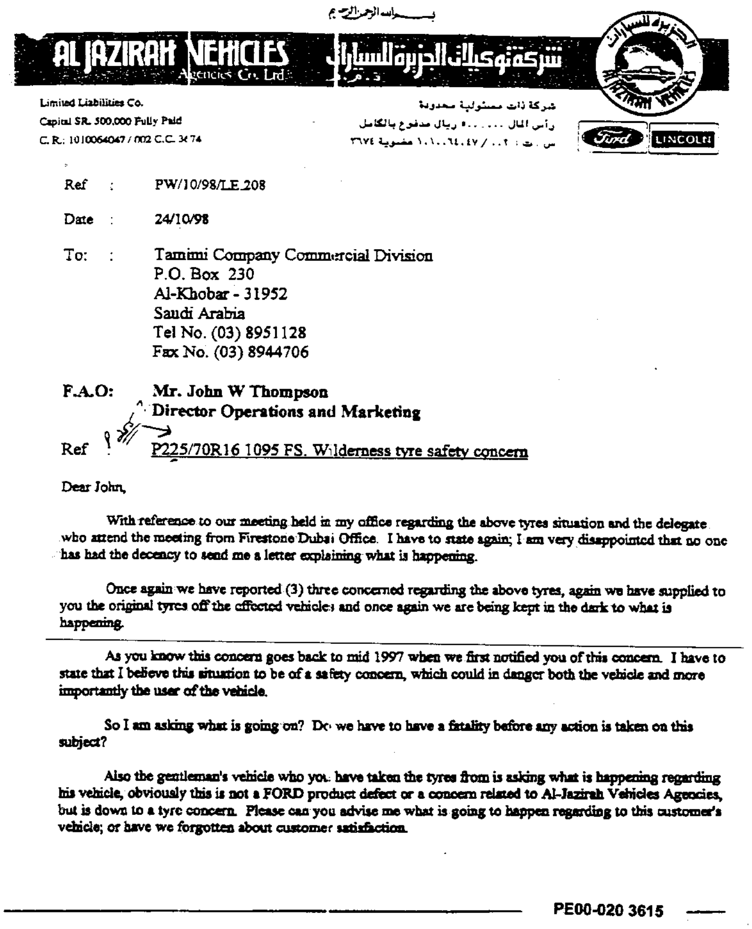


بسم الله الرحمن الرحيم

AL JAZIRAH VEHICLES Agencies Co. Ltd.

شركة توكيلات الجزيرة للسيارات ذ.م.م

Limited Liabilities Co.
Capital SR. 500,000 Fully Paid
C.R.: 1010064047 / 002 C.C. 3474

شركة ذات مسئولية محدودة
رأس المال ٥٠٠٠٠٠ ريال مدفوع بالكامل
س . ت : ٠٠٢ / ١٠١٠٠٦٤٠٤٧ عضوية ٣٦٧٤

Ford LINCOLN

Ref : PW/10/98/LE.208

Date : 24/10/98

To: : Tamimi Company Commercial Division
P.O. Box 230
Al-Khobar - 31952
Saudi Arabia
Tel No. (03) 8951128
Fax No. (03) 8944706

F.A.O: **Mr. John W Thompson**
Director Operations and Marketing

Ref : P225/70R16 1095 FS. Wilderness tyre safety concern

Dear John,

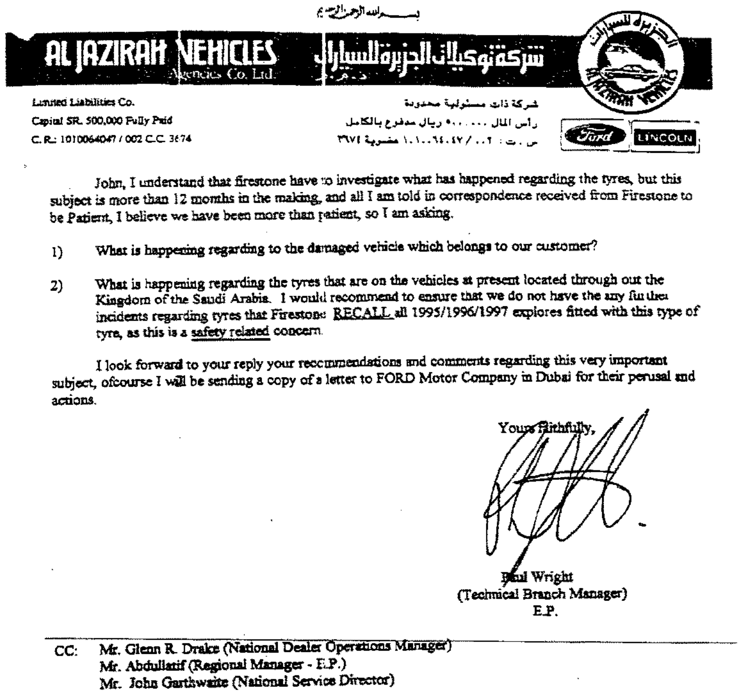
With reference to our meeting held in my office regarding the above tyres situation and the delegate who attend the meeting from Firestone Dubai Office. I have to state again; I am very disappointed that no one has had the decency to send me a letter explaining what is happening.

Once again we have reported (3) three concerned regarding the above tyres, again we have supplied to you the original tyres off the effected vehicles and once again we are being kept in the dark to what is happening.

As you know this concern goes back to mid 1997 when we first notified you of this concern. I have to state that I believe this situation to be of a safety concern, which could in danger both the vehicle and more importantly the user of the vehicle.

So I am asking what is going on? Do we have to have a fatality before any action is taken on this subject?

Also the gentleman's vehicle who you have taken the tyres from is asking what is happening regarding his vehicle, obviously this is not a FORD product defect or a concern related to Al-Jazirah Vehicles Agencies, but is down to a tyre concern. Please can you advise me what is going to happen regarding to this customer's vehicle; or have we forgotten about customer satisfaction.



بسم الله الرحمن الرحيم

AL JAZIRAH VEHICLES
Agencies Co. Ltd.

شركة توكيلات الجزيرة للسيارات

Limited Liabilities Co.
Capital SR. 500,000 Fully Paid
C. R.: 1010064047 / 002 C.C. 3674

شركة ذات مسئولية محدودة
رأس المال ٥٠٠٠٠٠ ريال مدفوع بالكامل
س . ت : ١٠١٠٠٦٤٠٤٧ / ٠٠٢ عضوية ٣٦٧٤

Ford LINCOLN

John, I understand that firestone have to investigate what has happened regarding the tyres, but this subject is more than 12 months in the making, and all I am told in correspondence received from Firestone to be Patient, I believe we have been more than patient, so I am asking.

1) What is happening regarding to the damaged vehicle which belongs to our customer?

2) What is happening regarding the tyres that are on the vehicles at present located through out the Kingdom of the Saudi Arabia. I would recommend to ensure that we do not have the any further incidents regarding tyres that Firestone RECALL all 1995/1996/1997 explores fitted with this type of tyre, as this is a safety related concern.

I look forward to your reply your reccommendations and comments regarding this very important subject, ofcourse I will be sending a copy of a letter to FORD Motor Company in Dubai for their perusal and actions.

Yours faithfully,

Paul Wright
(Technical Branch Manager)
E.P.

CC: Mr. Glenn R. Drake (National Dealer Operations Manager)
Mr. Abdullatif (Regional Manager - E.P.)
Mr. John Garthwaite (National Service Director)

BRIDGESTONE/FIRESTONE OE TIRES SALES COMPANY

To: Distribution

From: John E. Behr

Date: January 29, 1999

Subject: FORD EXPLORER - CONCERNS IN THE MIDDLE EAST (P255/70R16)

Earlier today I attended a meeting on the above subject with the following people from Ford's Worldwide Direct Market Operations group:

Chuck Seilnacht	Manager, Technical Service & Product Concerns
Melanie Gumz	Supervisor, Product Concerns
Dave Trost	Manager, Product Planning – Sport Utility Vehicles

The Ford people have two concerns relating to the three rollover accidents on Explorers fitted with our P255/70R16 Wilderness AT tires in the Middle East. The first is obvious – is there a defect with the subject tire which has resulted in the accidents. I attempted to assure the Ford people that we are not aware of any defect with these tires, and that we've supplied over 1.1 million of these same tires to Ford over the past three years (1996 thru 1998) for usage in North America, with excellent field performance. As to whether this tire is the best application for vehicles going to the Middle East, however, may be another issue.

The second concern the Ford people had was the length of time that it has taken to inspect the subject tires. Apparently the first accident occurred back in mid-1997, and they produced a long list of letters between their dealership (Al Jazirah) and our distributor ([illegible]) confirming this. We also had difficulty in matching the tire analysis report recently completed by Jim Gardner with the vehicle that the tires came from. We assumed that these tires actually came from the accident that occurred back in 1997. If that assumption is correct, the Ford people would also like to know why it took 1½ years to have these four tires inspected ? They would also like to know where the tires are from the other two vehicles ? Could anyone who has information with respect to these questions please respond, as the Ford people would like feedback from me by the end of next week (Feb. 5th).

The other issue discussed at the meeting was the potential usage of the P255/70R16 Wilderness HT BSW H tire as original fitment for Explorers exported to the Middle East, rather than the current P255/70R16 Wilderness AT OWL S. I explained that this request has been made to Ford, and that both Mr. Trost, and the Explorer platform engineering groups were reviewing this. I also explained that the H-rated tire would be better for high speed driving, and for resistance to heat buildup, but we would not expect it to be any better for puncture resistance. If the tire problems are related to improper repairs, as Mr. Gardner's report indicates on the one vehicle, the H-rated tire will likely not alleviate this problem. To that end, the Ford people asked what we are doing to educate our dealers in the Middle East as to the proper repair techniques. Shingo, could you please advise ? I gave the Ford people a copy of the RMA wall chart on proper repair procedures for passenger and LT tires, which I believe they will be copying and sending to their dealers in the Middle East.

John E. Behr
Account Executive
Original Equipment Tire Sales Co.

Distribution:
A. W. Stuart
J. Ujiyama
R. L. Pawling
R. O. Martin (N'ville)
D. R. Saurer (Akron)
D. J. Candido (Akron)
H. B. Horton / J. Gardner (Akron)
Y. Tomiyasu (GSC)
J. Saruwatari (GSC)
S. Katsura (Dubai)

11 OCT 99 11:46

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10/5

Inter Office

Ford Automotive Operations
Purchasing
Executive Director
Vehicle Proc. Operations
P. O. Box 1587, QMP
Maildrop 661

October 1, 1999

To: C. E. Mazzorin

From: L. A. Klein

Subject: Firestone Explorer Export Tire—GCC and Venezuela, UPDATE

Following is an update on the subject issue (reference August 27, 1999 letter):

GCC Market:

- Negotiations with Firestone have stopped. Firestone's position that the tire meets all quoted functional specifications, and that it was not meant for the GCC market application is confirmed by our research. It appears that Ford chose to use the North American specified tire in the GCC market, and Firestone was not part of that decision.

Venezuelan Market:

- The Firestone tire that has failed in the Venezuelan market was specifically developed for the Venezuelan market. Therefore, the responsibility for the failures in the Venezuelan market is presently directed at Firestone.
- The Ford of Venezuela Executive Committee decided approximately three weeks ago to conduct a Product Improvement Campaign which will notify all the affected customers in Venezuela to replace their tires with Goodyear tires free of charge. The range of cost is $3.4 million (60% response) up to $5.7 million (100% response).
- The Venezuelan Purchasing activity is beginning negotiations with Firestone during the week of October 4, 1999. We will provide any requested assistance on these negotiations.

Carlos Mazzorin

Chris
Any new devel
in this
9/.

September 15, 1999

Wayne Booker	Jim Padilla
Louise Goeser	Richard Parry-Jones
Vaughn Koshkarian	Bob Rewey
Jac Nasser	Henry Wallace

In one of our BIC meetings the following issue was brought up: While driving the vehicle at high speeds, for prolonged periods of time, the tire tread separated (belt edge separation) from the main carcass of the tire. Nineteen rollovers attributed to this issue have occurred in Saudi Arabia, Oman and Qatar combined. Several fatalities have resulted. The issue has also occurred in Venezuela, and fatalities have also resulted in that market. No known instances have occurred in other markets.

I am attaching, for your information, the report of actions taken on this.

Carlos
9/15

Inter Office

Ford Automotive Operations
Purchasing
Executive Director
Vehicle Proc. Operations
P. O. Box 1587, GMP
Maildrop 661

August 27,1999

To: C. E. Mazzorin

From: L. A. Klein

Subject: Firestone Explorer Export Tire—GCC and Venezuela

Following is the background, current state and next steps regarding the subject tire.

Background

Issue description: While driving the vehicle at high speeds, for prolonged periods of time, the tire tread separated (belt edge separation) from the main carcass of the tire. 19 rollovers attributed to this issue have occurred in Saudi Arabia, Oman and Qatar combined. Several fatalities have resulted. The issue has also occurred in Venezuela, and fatalities have also resulted in that market. No known instances have occurred in other markets.

Root cause has not been identified, because it has not been possible to replicate the issue in a test environment.

⇒ GCC Market Specifics

Total Explorer/ Mountaineers sold from 1995-1999 was 6,755 units.

Year around hot temperatures (exceeding 115 F in the summer months), and excellent highway areas without speed zones, which allow for 100 mph cruising for several hours at a time.

The tire was not developed for the Middle East application. Speed rating has been "S", which allows for speeds up to 112 mph. The Middle East application would require several unique characteristics: higher speed ratings ("T" minimum); light truck tread compound as opposed to low rolling resistance passenger car construction which will make it more resistant to puncture; reduced skid so it runs cooler and does not last as long (chip tear resistance). Time and temperature are attributes to degradation.

Tires in question began shipment to GCC in 1995. Ford first became aware of the issue in GCC markets in December 1998. Several meetings by WDMO and Firestone representatives and visits to GCC market followed to evaluate the situation, culminating in "current state and next actions" below.

⇒ Venezuelan Market Specifics

Total size of Explorer/Mountaineer market is 14,000 vehicles/year.

Tires in question began shipment in 1996. Ford discovered the issue in early spring 1999.

The Venezuelan market does not have speed zones, and is susceptible to very high speeds. The consistent speed may reach 115-120mph. The tire initially provided to the Venezuelan market had a speed rating of "R" which allows for speeds up to 106 mph. In June 1999, the speed rating was changed to "S". The tire offered to Venezuela is made in Venezuela and is of more durable construction than the "S" sold in Saudi Arabia. Firestone's capacity can only support the Venezuelan market with this tire.

Current State

GCC: Ford has notified Explorer/Mountaineer owners that they are strongly encouraged to bring their vehicles to the Ford dealers for tire replacement. Goodyear tires specifically developed for GCC are being used as substitutes. The replacement is done free of charge. Ford is currently incurring full cost. Discussions have started with Firestone as to have them cover the cost. Total cost is $4.3 million. Firestone has adamantly opposed sharing any cost, as they allege the tire is not faulty, and was never meant for the GCC market.

Venezuela: Two options, currently being reviewed by President of Ford Argentina.

a) Retrofit vehicles with new "S" rated Firestone tires.
b) Retrofit vehicles with GCC GY tire.

Cost of either proposal is not fully calculated at this time and responsibility has not been discussed.

NEXT STEPS

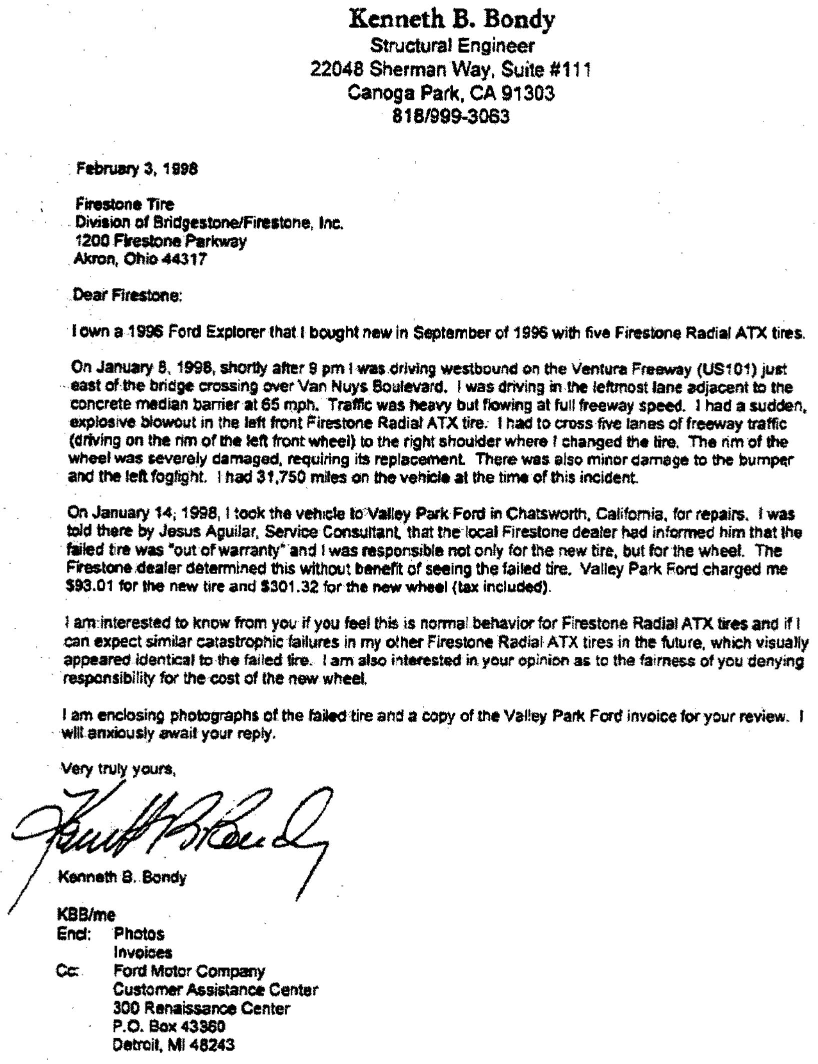
* Continue developing testing procedures to replicate GCC and Venezuelan road conditions to identify root cause and develop optimal tire.

* On U152 program develop a tire for global non-NA application. Firestone has already started development, but Purchasing has also pushed for introduction of other vendors. Engineering target letters are being finalized. Tire to be "U" speed capable (124 mph) but marked with "T" (118 mph) to allow for buffer of safety.

* Evaluating speed limiting the vehicles.

* Address cost issue and responsibility for coverage.

Please advise of any questions or comments.



Kenneth B. Bondy
Structural Engineer
22048 Sherman Way, Suite #111
Canoga Park, CA 91303
818/999-3063

February 3, 1998

Firestone Tire
Division of Bridgestone/Firestone, Inc.
1200 Firestone Parkway
Akron, Ohio 44317

Dear Firestone:

I own a 1996 Ford Explorer that I bought new in September of 1996 with five Firestone Radial ATX tires.

On January 8, 1998, shortly after 9 pm I was driving westbound on the Ventura Freeway (US101) just east of the bridge crossing over Van Nuys Boulevard. I was driving in the leftmost lane adjacent to the concrete median barrier at 65 mph. Traffic was heavy but flowing at full freeway speed. I had a sudden, explosive blowout in the left front Firestone Radial ATX tire. I had to cross five lanes of freeway traffic (driving on the rim of the left front wheel) to the right shoulder where I changed the tire. The rim of the wheel was severely damaged, requiring its replacement. There was also minor damage to the bumper and the left foglight. I had 31,750 miles on the vehicle at the time of this incident.

On January 14, 1998, I took the vehicle to Valley Park Ford in Chatsworth, California, for repairs. I was told there by Jesus Aguilar, Service Consultant, that the local Firestone dealer had informed him that the failed tire was "out of warranty" and I was responsible not only for the new tire, but for the wheel. The Firestone dealer determined this without benefit of seeing the failed tire. Valley Park Ford charged me $93.01 for the new tire and $301.32 for the new wheel (tax included).

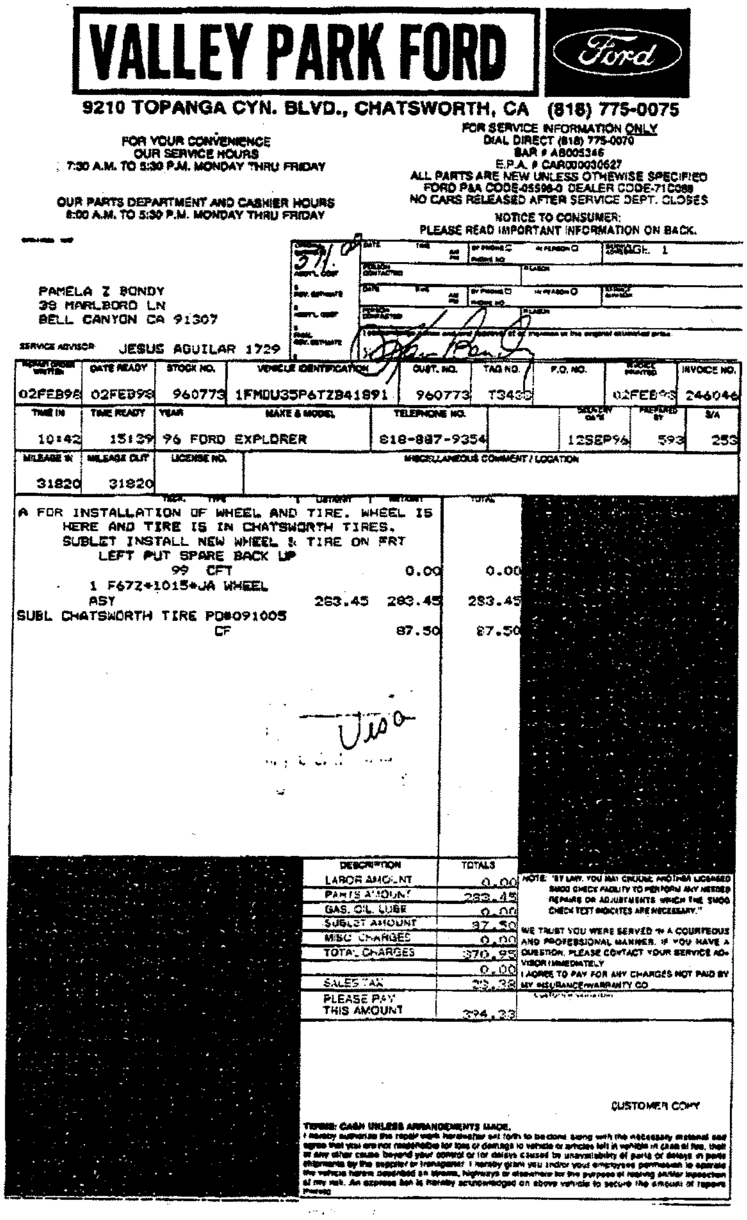
I am interested to know from you if you feel this is normal behavior for Firestone Radial ATX tires and if I can expect similar catastrophic failures in my other Firestone Radial ATX tires in the future, which visually appeared identical to the failed tire. I am also interested in your opinion as to the fairness of you denying responsibility for the cost of the new wheel.

I am enclosing photographs of the failed tire and a copy of the Valley Park Ford invoice for your review. I will anxiously await your reply.

Very truly yours,

Kenneth B. Bondy

KBB/me
Encl: Photos
Invoices
Cc: Ford Motor Company
Customer Assistance Center
300 Renaissance Center
P.O. Box 43360
Detroit, MI 48243



VALLEY PARK FORD

Ford

9210 TOPANGA CYN. BLVD., CHATSWORTH, CA (818) 775-0075

FOR YOUR CONVENIENCE
OUR SERVICE HOURS
7:30 A.M. TO 5:30 P.M. MONDAY THRU FRIDAY

OUR PARTS DEPARTMENT AND CASHIER HOURS
8:00 A.M. TO 5:30 P.M. MONDAY THRU FRIDAY

FOR SERVICE INFORMATION ONLY
DIAL DIRECT (818) 775-0070
BAR # AB005346
E.P.A. # CAR000030627
ALL PARTS ARE NEW UNLESS OTHEWISE SPECIFIED
FORD P&A CODE-05596-0 DEALER CODE-71C088
NO CARS RELEASED AFTER SERVICE DEPT. CLOSES

NOTICE TO CONSUMER:
PLEASE READ IMPORTANT INFORMATION ON BACK.

PAMELA Z BONDY
39 MARLBORO LN
BELL CANYON CA 91307

ORIGINAL ESTIMATE 571.	DATE	TIME AM PM	BY PHONE ☐ PHONE NO.	IN PERSON ☐	PAGE 1
ADDT'L COST	PERSON CONTACTED		REASON		
$ REV. ESTIMATE	DATE	TIME AM PM	BY PHONE ☐ PHONE NO.	IN PERSON ☐	SERVICE ADVISOR
$ ADDT'L COST	PERSON CONTACTED		REASON		
$ FINAL REV. ESTIMATE					

SERVICE ADVISOR JESUS AGUILAR 1729

REPAIR ORDER WRITTEN	DATE READY	STOCK NO.	VEHICLE IDENTIFICATION	CUST. NO.	TAG NO.	P.O. NO.	INVOICE PRINTED	INVOICE NO.
02FEB98	02FEB98	960773	1FMDU35P6TZB41891	960773	T3430		02FEB98	246046

TIME IN	TIME READY	YEAR	MAKE & MODEL	TELEPHONE NO.		DELIVERY DATE	PREPARED BY	S/A
10:42	15:39	96	FORD EXPLORER	818-887-9354		12SEP96	593	253

MILEAGE IN	MILEAGE OUT	LICENSE NO.	MISCELLANEOUS COMMENT / LOCATION
31820	31820		

```
A FOR INSTALLATION OF WHEEL AND TIRE. WHEEL IS
    HERE AND TIRE IS IN CHATSWORTH TIRES.
    SUBLET INSTALL NEW WHEEL & TIRE ON FRT
      LEFT PUT SPARE BACK UP
               99  CFT                    0.00      0.00
      1 F67Z*1015*JA WHEEL
      ASY                   283.45   283.45       283.45
SUBL CHATSWORTH TIRE PO#091005
                     CF                  87.50     87.50
```

Visa

[redacted]

[redacted]

DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	283.45
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	87.50
MISC CHARGES	0.00
TOTAL CHARGES	370.95
	0.00
SALES TAX	23.38
PLEASE PAY THIS AMOUNT	394.33

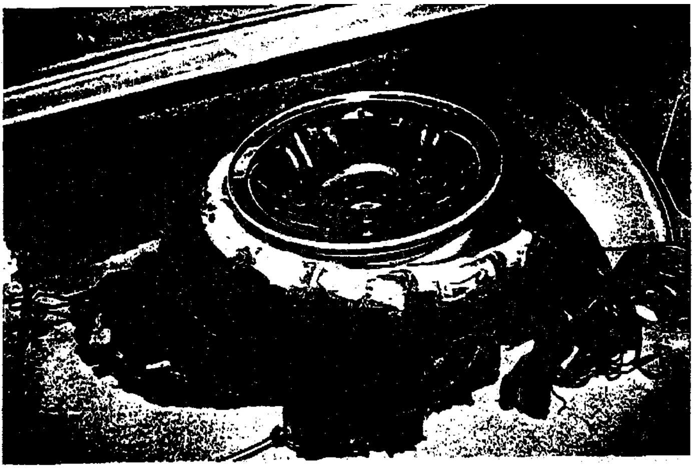
NOTE: "BY LAW, YOU MAY CHOOSE ANOTHER LICENSED SMOG CHECK FACILITY TO PERFORM ANY NEEDED REPAIRS OR ADJUSTMENTS WHICH THE SMOG CHECK TEST INDICATES ARE NECESSARY."

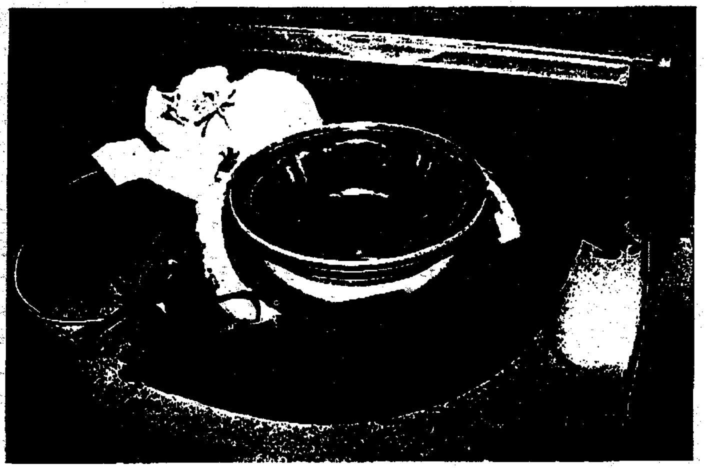
WE TRUST YOU WERE SERVED IN A COURTEOUS AND PROFESSIONAL MANNER. IF YOU HAVE A QUESTION, PLEASE CONTACT YOUR SERVICE ADVISOR IMMEDIATELY
I AGREE TO PAY FOR ANY CHARGES NOT PAID BY MY INSURANCE/WARRANTY CO

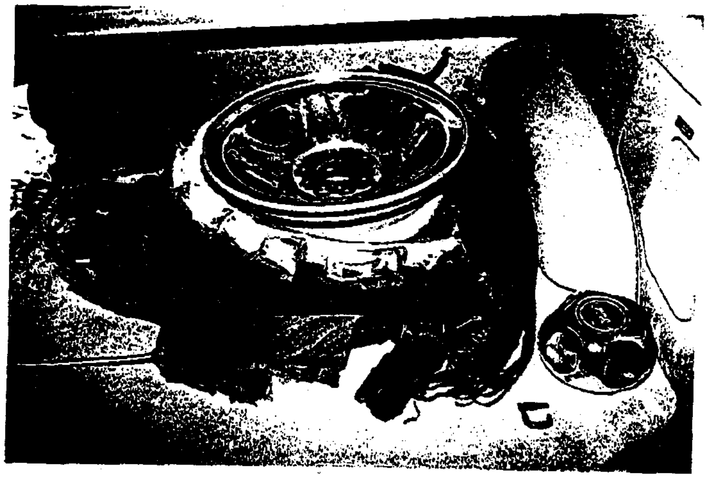
CUSTOMER SIGNATURE

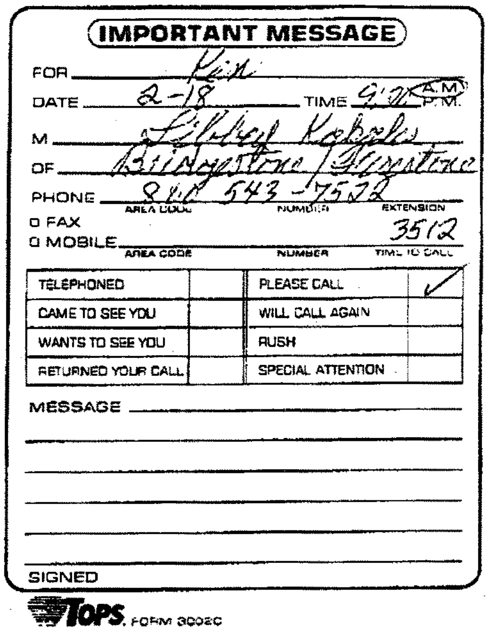
CUSTOMER COPY

TERMS: CASH UNLESS ARRANGEMENTS MADE.
I hereby authorize the repair work hereinafter set forth to be done along with the necessary material and agree that you are not responsible for loss or damage to vehicle or articles left in vehicle in case of fire, theft or any other cause beyond your control or for delays caused by unavailability of parts or delays in parts shipments by the supplier or transporter. I hereby grant you and/or your employees permission to operate the vehicle herein described on streets, highways or elsewhere for the purpose of testing and/or inspection at my risk. An express lien is hereby acknowledged on above vehicle to secure the amount of repairs thereto.









IMPORTANT MESSAGE

FOR Kim

DATE 2-18 TIME 9:25 [✓ A.M.] P.M.

M Libbey Kobales

OF Bridgestone / Firestone

PHONE 800 543-7522 3512
AREA CODE NUMBER EXTENSION

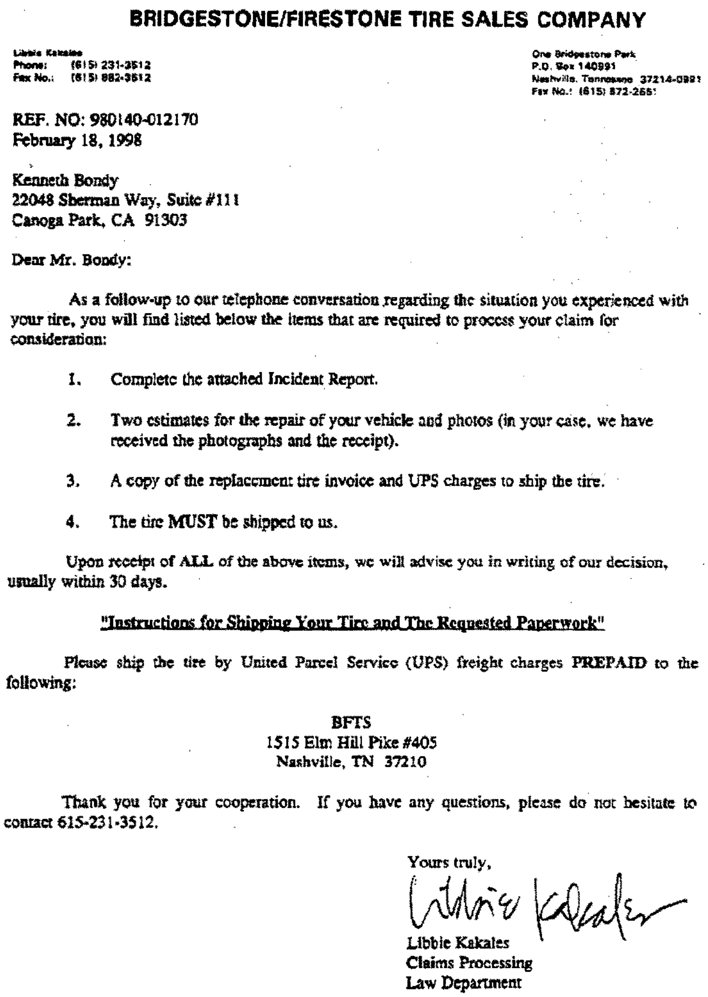
☐ FAX
☐ MOBILE
AREA CODE NUMBER TIME TO CALL

TELEPHONED		PLEASE CALL	✓
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED

TOPS. FORM 3002C



BRIDGESTONE/FIRESTONE TIRE SALES COMPANY

Libbie Kakales
Phone: (615) 231-3512
Fax No.: (615) 882-3512

One Bridgestone Park
P.O. Box 140991
Nashville, Tennessee 37214-0991
Fax No.: (615) 872-2651

REF. NO: 980140-012170
February 18, 1998

Kenneth Bondy
22048 Sherman Way, Suite #111
Canoga Park, CA 91303

Dear Mr. Bondy:

As a follow-up to our telephone conversation regarding the situation you experienced with your tire, you will find listed below the items that are required to process your claim for consideration:

1. Complete the attached Incident Report.
2. Two estimates for the repair of your vehicle and photos (in your case, we have received the photographs and the receipt).
3. A copy of the replacement tire invoice and UPS charges to ship the tire.
4. The tire **MUST** be shipped to us.

Upon receipt of **ALL** of the above items, we will advise you in writing of our decision, usually within 30 days.

"Instructions for Shipping Your Tire and The Requested Paperwork"

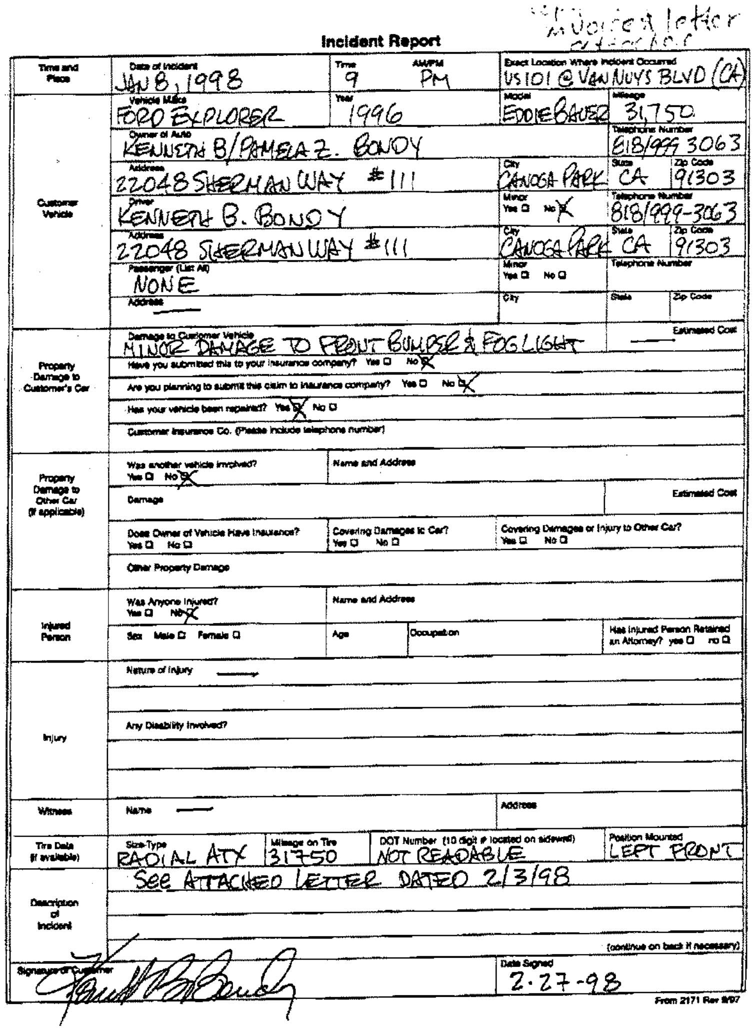
Please ship the tire by United Parcel Service (UPS) freight charges **PREPAID** to the following:

BFTS
1515 Elm Hill Pike #405
Nashville, TN 37210

Thank you for your cooperation. If you have any questions, please do not hesitate to contact 615-231-3512.

Yours truly,

Libbie Kakales
Claims Processing
Law Department



[illegible] letter [illegible]

Incident Report

Time and Place
Date of Incident: JAN 8, 1998
Time: 9
AM/PM: PM
Exact Location Where Incident Occurred: US101 @ VAN NUYS BLVD (CA)

Customer Vehicle
Vehicle Make: FORD EXPLORER
Year: 1996
Model: EDDIE BAUER
Mileage: 31,750
Owner of Auto: KENNETH B/PAMELA Z. BONDY
Telephone Number: 818/999 3063
Address: 22048 SHERMAN WAY #111
City: CANOGA PARK
State: CA
Zip Code: 91303
Driver: KENNETH B. BONDY
Minor: Yes ☐ No ☒
Telephone Number: 818/999-3063
Address: 22048 SHERMAN WAY #111
City: CANOGA PARK
State: CA
Zip Code: 91303
Passenger (List All): NONE
Minor: Yes ☐ No ☐
Telephone Number
Address: —
City
State
Zip Code

Property Damage to Customer's Car
Damage to Customer Vehicle: MINOR DAMAGE TO FRONT BUMPER & FOG LIGHT
Estimated Cost: —
Have you submitted this to your insurance company? Yes ☐ No ☒
Are you planning to submit this claim to insurance company? Yes ☐ No ☒
Has your vehicle been repaired? Yes ☒ No ☐
Customer Insurance Co. (Please include telephone number)

Property Damage to Other Car (if applicable)
Was another vehicle involved? Yes ☐ No ☒
Name and Address
Damage
Estimated Cost
Does Owner of Vehicle Have Insurance? Yes ☐ No ☐
Covering Damages to Car? Yes ☐ No ☐
Covering Damages or Injury to Other Car? Yes ☐ No ☐
Other Property Damage

Injured Person
Was Anyone Injured? Yes ☐ No ☒
Name and Address
Sex Male ☐ Female ☐
Age
Occupation
Has Injured Person Retained an Attorney? yes ☐ no ☐

Injury
Nature of Injury ⟶
Any Disability Involved?

Witness
Name —
Address

Tire Data (if available)
Size-Type: RADIAL ATX
Mileage on Tire: 31750
DOT Number (10 digit # located on sidewall): NOT READABLE
Position Mounted: LEFT FRONT

Description of Incident
SEE ATTACHED LETTER DATED 2/3/98

(continue on back if necessary)

Signature of Customer:
Date Signed: 2-27-98

From 2171 Rev 8/97

Ford Customer Service Division
Ford Motor Company

P.O. Box 43360
Detroit, Michigan 48243

February 18, 1998

Mr. Kenneth B. Bondy
22048 Sherman Way Suite 111
Canoga Park CA 91303

Dear Mr. Bondy:

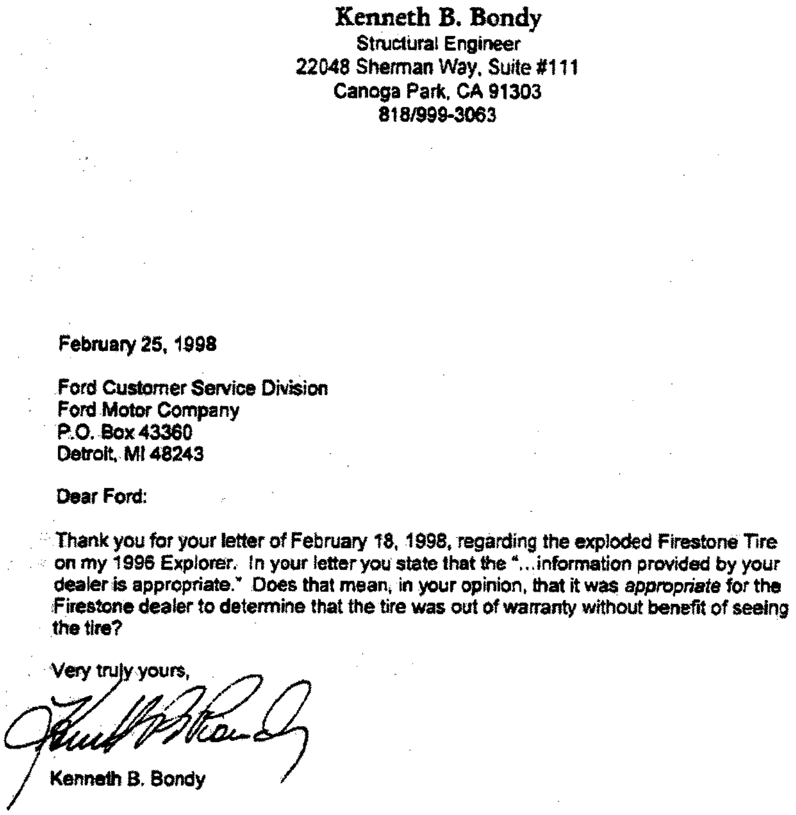
The circumstances which you outlined concerning your 1996 Explorer have been given careful consideration.

Ford Motor Company considers the satisfaction of its owners to be one of its most important objectives. We commit very substantial resources and effort in a sincere attempt to resolve the concerns of our owners. However, limits must be placed on those efforts. Although we regret not being able to meet your expectations, our review indicates that the information provided by your dealer is appropriate. Therefore, we are unable to be of assistance in this matter.

We are sorry that our response could not be more favorable to you. Thank you for contacting us.

Sincerely,

Ford Customer Assistance Center



Kenneth B. Bondy
Structural Engineer
22048 Sherman Way, Suite #111
Canoga Park, CA 91303
818/999-3063

February 25, 1998

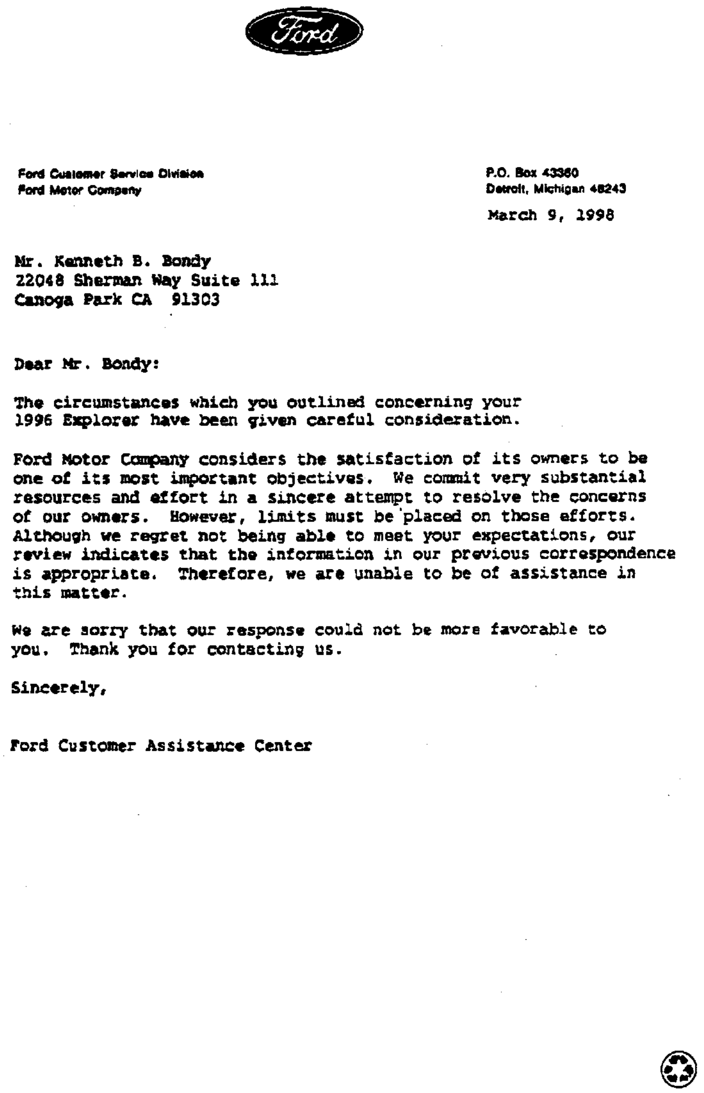
Ford Customer Service Division
Ford Motor Company
P.O. Box 43360
Detroit, MI 48243

Dear Ford:

Thank you for your letter of February 18, 1998, regarding the exploded Firestone Tire on my 1996 Explorer. In your letter you state that the "...information provided by your dealer is appropriate." Does that mean, in your opinion, that it was *appropriate* for the Firestone dealer to determine that the tire was out of warranty without benefit of seeing the tire?

Very truly yours,

Kenneth B. Bondy



Ford Customer Service Division
Ford Motor Company

P.O. Box 43360
Detroit, Michigan 48243

March 9, 1998

Mr. Kenneth B. Bondy
22048 Sherman Way Suite 111
Canoga Park CA 91303

Dear Mr. Bondy:

The circumstances which you outlined concerning your 1996 Explorer have been given careful consideration.

Ford Motor Company considers the satisfaction of its owners to be one of its most important objectives. We commit very substantial resources and effort in a sincere attempt to resolve the concerns of our owners. However, limits must be placed on those efforts. Although we regret not being able to meet your expectations, our review indicates that the information in our previous correspondence is appropriate. Therefore, we are unable to be of assistance in this matter.

We are sorry that our response could not be more favorable to you. Thank you for contacting us.

Sincerely,

Ford Customer Assistance Center

BFTS
1515 Elm Hill Pike
Nashville, TN 3721
Fax No.: (615) 361-6707

3/10/98

MR. KENNETH BONDY
22048 SHERMAN WAY, SUITE #111
CANOGA PARK, CA 91303

Dear MR. BONDY:

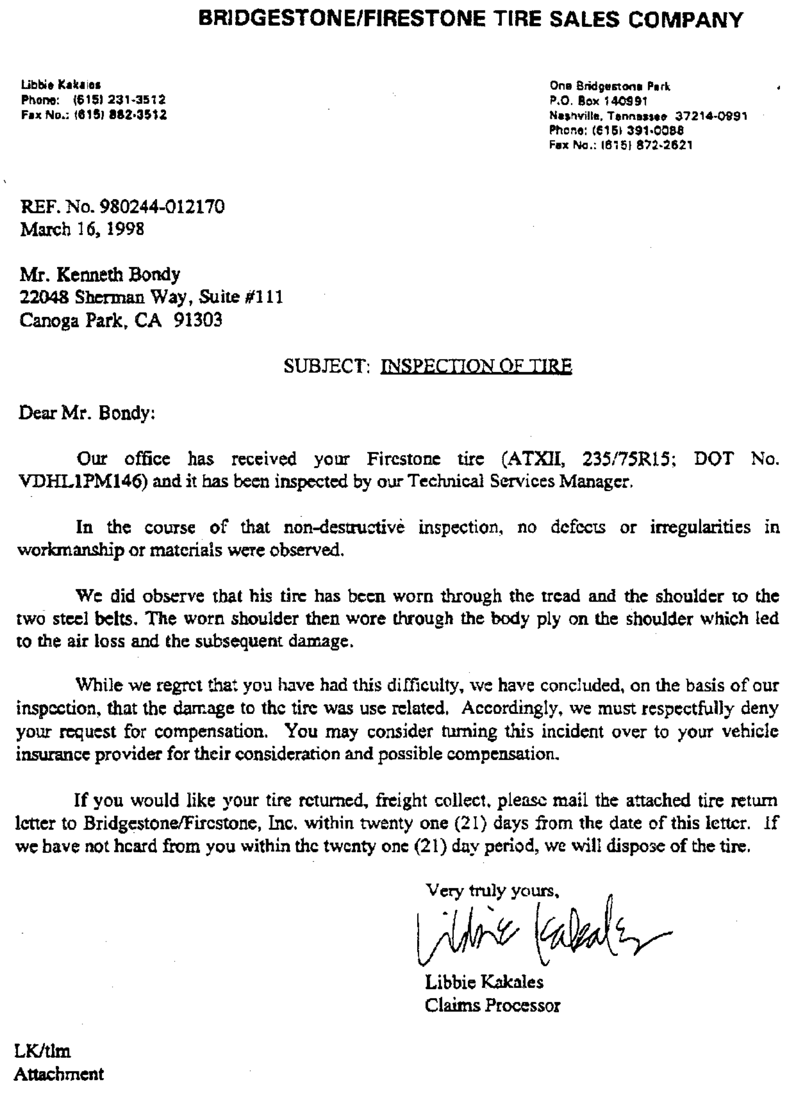
Thank you for forwarding all the necessary items to begin the evaluation of your claim.

Our analysis is extensive. It may take approximately 30 days to complete. We will notify you in writing of our decision after a thorough review of all materials and information supplied to us has been completed.

Once again, let us thank you for your patience and cooperation in this matter. If you have any further questions, please do not hesitate to contact us at 1-800-356-4644.

Yours truly,

Claims Processing



BRIDGESTONE/FIRESTONE TIRE SALES COMPANY

Libbie Kakales
Phone: (615) 231-3512
Fax No.: (615) 882-3512

One Bridgestone Park
P.O. Box 140991
Nashville, Tennessee 37214-0991
Phone: (615) 391-0088
Fax No.: (615) 872-2621

REF. No. 980244-012170
March 16, 1998

Mr. Kenneth Bondy
22048 Sherman Way, Suite #111
Canoga Park, CA 91303

SUBJECT: INSPECTION OF TIRE

Dear Mr. Bondy:

Our office has received your Firestone tire (ATXII, 235/75R15; DOT No. VDHL1PM146) and it has been inspected by our Technical Services Manager.

In the course of that non-destructive inspection, no defects or irregularities in workmanship or materials were observed.

We did observe that his tire has been worn through the tread and the shoulder to the two steel belts. The worn shoulder then wore through the body ply on the shoulder which led to the air loss and the subsequent damage.

While we regret that you have had this difficulty, we have concluded, on the basis of our inspection, that the damage to the tire was use related. Accordingly, we must respectfully deny your request for compensation. You may consider turning this incident over to your vehicle insurance provider for their consideration and possible compensation.

If you would like your tire returned, freight collect, please mail the attached tire return letter to Bridgestone/Firestone, Inc. within twenty one (21) days from the date of this letter. If we have not heard from you within the twenty one (21) day period, we will dispose of the tire.

Very truly yours,

Libbie Kakales

Libbie Kakales
Claims Processor

LK/tlm
Attachment

Bridgestone/Firestone, Inc.
One Bridgestone Park
P.O. Box 140991
Nashville, TN 37214-0991
Attention: Legal Department

Re: Tire Return

Dear Sirs:

Please return the tire submitted to Bridgestone/Firestone, Inc. and referred to in your letter to me, Kenneth Bondy, dated March 16, 1998.

I am requesting the tire be shipped "Freight Collect" to:

Name: Ken Bondy

Address: 22048 Sherman Way #111

City: Canoga Park State: CA Zip: 91303

Carrier Preference: UPS

(If none stated, Bridgestone/Firestone, Inc. may ship via carrier of their choice.)

Signature: Date: 3-18-98

Kenneth B. Bondy
Structural Engineer
22048 Sherman Way, Suite #111
Canoga Park, CA 91303
818/999-3063

April 3, 1998

Ms. Libbie Kakales
Claims Processor
Bridgestone/Firestone Tire Sales Company
One Bridgestone Park
P.O. Box 140991
Nashville, TN 37214-0991

Subject: **Radial ATX Tire Failure**
Your Reference #980244-012170

Dear Ms. Kakales:

I received your letter of March 16, 1998. Your analysis of the failure was very interesting, however it leaves me with some nagging and unresolved questions. Perhaps you or your Technical Services Manager could help me by addressing the following concerns:

- You conclude that the "...damage to the tire was ***use related***" (emphasis by me). What type of tire damage is ***not*** related to the use of the tire? Are you actually saying that your denial of responsibility for the performance of this tire was merely because it was used? If not, what exactly does "use related" mean?

- You state that the failure was produced by wear through the tread and the shoulder, all the way down to the steel belts. In your opinion, would such wear have been visible before the failure? Should a routine visual inspection of the tire have revealed the wear? Or could this type of wear be hidden and impossible to diagnose?

- How could you determine that the "...tire has been worn through the tread..." when there is virtually no tread in what remains of the tire? The tread completely separated from the rest of the tire when the tire failed and was left on the Ventura Freeway.

- If the alleged wear in this tire would have been visible, as opposed to hidden, why do my remaining three Firestone Radial ATX tires still show no such wear, even though they experienced exactly the same service conditions as the failed tire? On the date the attached photos of the three remaining tires were made (March 20, 1998), they had 35,771 miles on them, 4,021 more miles than they had at the time the fourth tire failed.

- How could only ***one*** of four new tires, all installed at the same time (on a new vehicle) and all with identical mileage and service conditions, suffer such dangerous and extensive wear that it results in a catastrophic, explosive failure, while the other three tires show no unusual wear whatsoever, even 4000 miles after the failure? Doesn't that somehow suggest to you that the failed tire was defective?

- Do you feel that the behavior of the failed tire, or the amount of wear you allege, was ***normal*** for a tire with 31,750 miles of service, all on paved Southern California highways?

- Can I expect similar catastrophic failures in my other three Firestone Radial ATX tires?

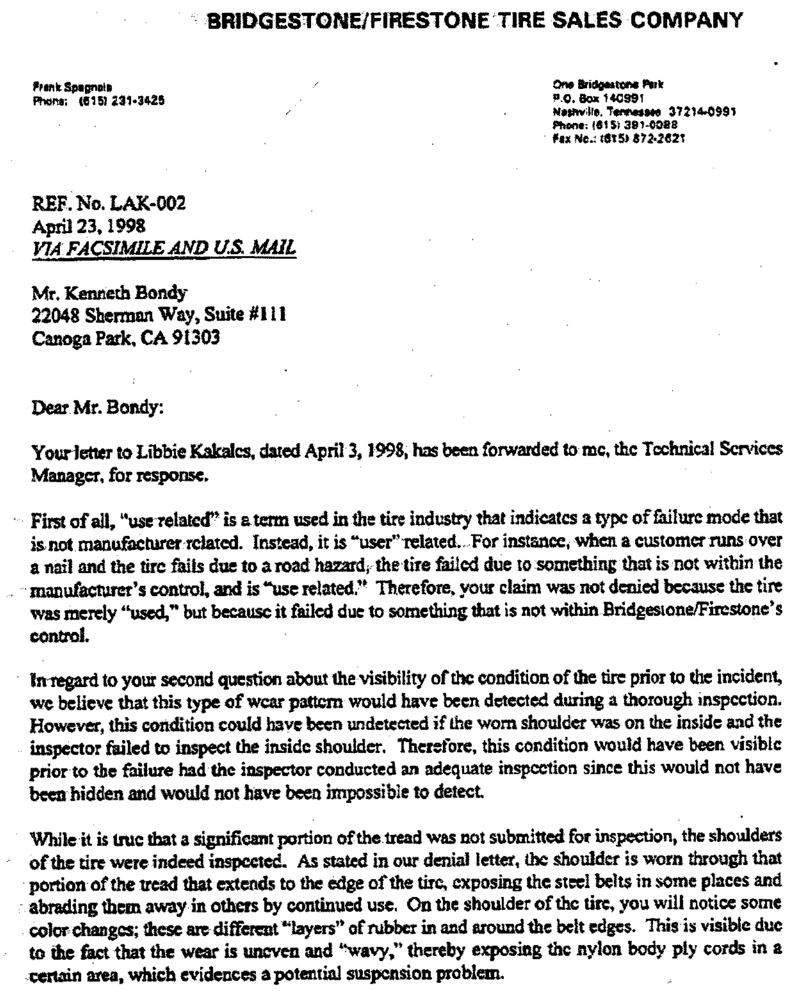
Ms. Kakales, despite your analysis of the tire failure, it is my opinion that you sold me a defective tire that not only caused me financial damage, but put my life at risk because of its extraordinarily poor performance. If I do not receive a satisfactory response from you by April 24, 1998, I will proceed with whatever means are available to me to address these grievances. Those means will include the California court system and existing California agencies for consumer protection. I will also inform the local Los Angeles news media about this incident and your handling of it, because I believe that information is important to other Southern California tire purchasers.

Very truly yours,

Kenneth B. Bondy

Cc: Ford Motor Company

6 photos to Firestone



BRIDGESTONE/FIRESTONE TIRE SALES COMPANY

Frank Spagnola
Phone: (615) 231-3425

One Bridgestone Park
P.O. Box 140991
Nashville, Tennessee 37214-0991
Phone: (615) 391-0088
Fax No.: (615) 872-2621

REF. No. LAK-002
April 23, 1998
VIA FACSIMILE AND U.S. MAIL

Mr. Kenneth Bondy
22048 Sherman Way, Suite #111
Canoga Park, CA 91303

Dear Mr. Bondy:

Your letter to Libbie Kakales, dated April 3, 1998, has been forwarded to me, the Technical Services Manager, for response.

First of all, "use related" is a term used in the tire industry that indicates a type of failure mode that is not manufacturer related. Instead, it is "user" related. For instance, when a customer runs over a nail and the tire fails due to a road hazard, the tire failed due to something that is not within the manufacturer's control, and is "use related." Therefore, your claim was not denied because the tire was merely "used," but because it failed due to something that is not within Bridgestone/Firestone's control.

In regard to your second question about the visibility of the condition of the tire prior to the incident, we believe that this type of wear pattern would have been detected during a thorough inspection. However, this condition could have been undetected if the worn shoulder was on the inside and the inspector failed to inspect the inside shoulder. Therefore, this condition would have been visible prior to the failure had the inspector conducted an adequate inspection since this would not have been hidden and would not have been impossible to detect.

While it is true that a significant portion of the tread was not submitted for inspection, the shoulders of the tire were indeed inspected. As stated in our denial letter, the shoulder is worn through that portion of the tread that extends to the edge of the tire, exposing the steel belts in some places and abrading them away in others by continued use. On the shoulder of the tire, you will notice some color changes; these are different "layers" of rubber in and around the belt edges. This is visible due to the fact that the wear is uneven and "wavy," thereby exposing the nylon body ply cords in a certain area, which evidences a potential suspension problem.

Fourth, you expressed your concern over the fact that none of your remaining tires show such wear. The photos of your other three tires that you submitted show that the inside of the right front tire is wearing much quicker than the outside shoulder. This is similar to the left front tire that you submitted; however, the right front tire seems to be wearing at a slower rate than the left front tire. This usually indicates a problem with your suspension (i.e. alignment or worn parts). This picture also indicates that there is significant amount of "wavy wear," which usually indicates that there is a sufficient amount of toe change which causes an irregular wear pattern. It is imperative that you have this tire inspected and have your suspension checked.

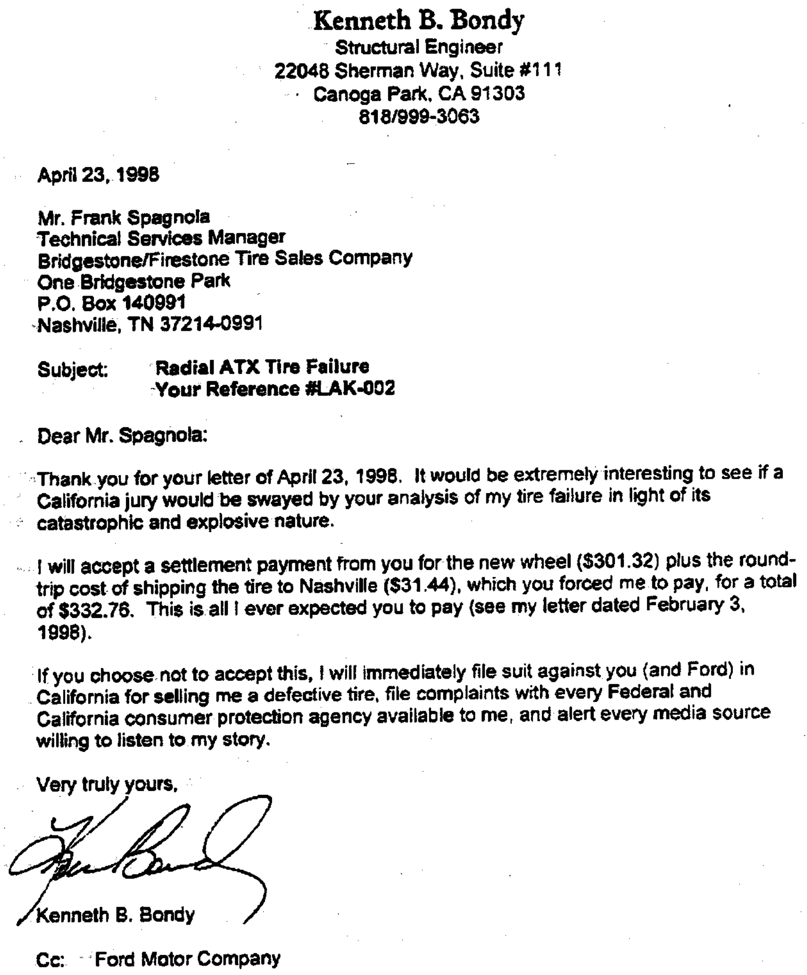
Addressing what is "normal" and why only one tire shows any abnormal conditions? We have indicated that the right front tire is not wearing properly according to your pictures. The rear tires appear to be wearing smooth and give all indications that the mileage you receive could exceed your expectations. Routine rotation of the tires, every 5,000 miles, and having your suspension corrected would help to eliminate your problem and increase the life of your tires.

We hope that this letter clarifies your questions about our findings regarding the tire you submitted for inspection. Although our analysis of your claim indicates that your tire did not fail due to something within our control, we would like to offer $200 on a customer satisfaction basis. If you would like to discuss this situation any further, please call me, or call Ms. Kakales to discuss our offer.

Sincerely,

Frank Spagnola /tcm

Frank Spagnola
Technical Services Manager



Kenneth B. Bondy
Structural Engineer
22048 Sherman Way, Suite #111
Canoga Park, CA 91303
818/999-3063

April 23, 1998

Mr. Frank Spagnola
Technical Services Manager
Bridgestone/Firestone Tire Sales Company
One Bridgestone Park
P.O. Box 140991
Nashville, TN 37214-0991

Subject: **Radial ATX Tire Failure**
Your Reference #LAK-002

Dear Mr. Spagnola:

Thank you for your letter of April 23, 1998. It would be extremely interesting to see if a California jury would be swayed by your analysis of my tire failure in light of its catastrophic and explosive nature.

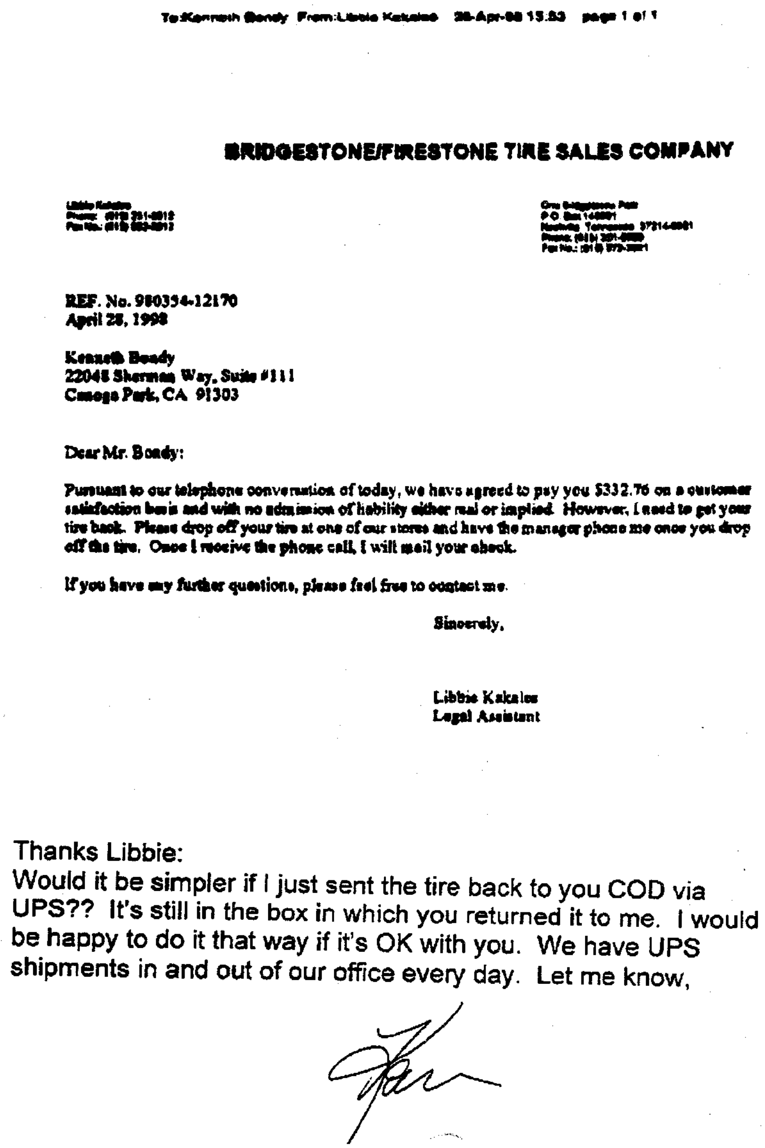
I will accept a settlement payment from you for the new wheel ($301.32) plus the round-trip cost of shipping the tire to Nashville ($31.44), which you forced me to pay, for a total of $332.76. This is all I ever expected you to pay (see my letter dated February 3, 1998).

If you choose not to accept this, I will immediately file suit against you (and Ford) in California for selling me a defective tire, file complaints with every Federal and California consumer protection agency available to me, and alert every media source willing to listen to my story.

Very truly yours,

Kenneth B. Bondy

Cc: Ford Motor Company



To:Kenneth Bondy From:Libbie Kakales 28-Apr-98 15:53 page 1 of 1

BRIDGESTONE/FIRESTONE TIRE SALES COMPANY

REF. No. 980354-12170
April 28, 1998

Kenneth Bondy
22048 Sherman Way, Suite #111
Canoga Park, CA 91303

Dear Mr. Bondy:

Pursuant to our telephone conversation of today, we have agreed to pay you $332.76 on a customer satisfaction basis and with no admission of liability either real or implied. However, I need to get your tire back. Please drop off your tire at one of our stores and have the manager phone me once you drop off the tire. Once I receive the phone call, I will mail your check.

If you have any further questions, please feel free to contact me.

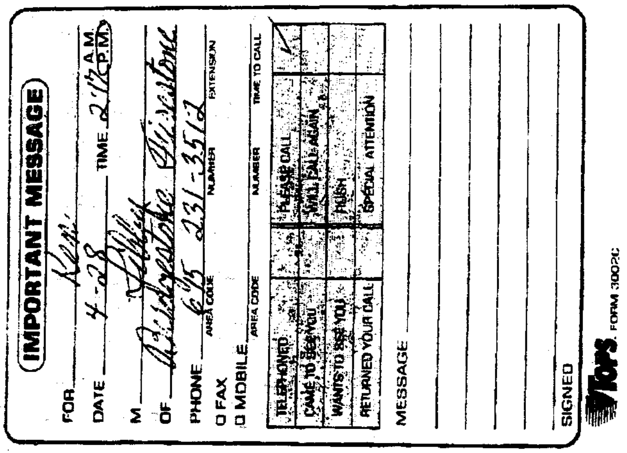
Sincerely,

Libbie Kakales
Legal Assistant

Thanks Libbie:
Would it be simpler if I just sent the tire back to you COD via UPS?? It's still in the box in which you returned it to me. I would be happy to do it that way if it's OK with you. We have UPS shipments in and out of our office every day. Let me know,

Ken

Will send OK FDC
Full amount
4/28/98 2:50pm



IMPORTANT MESSAGE

FOR Ken.
DATE 4-28 TIME 2:17 A.M. [✓ P.M.]
M Libby
OF Bridgestone Firestone
PHONE 615 231-3512 (AREA CODE / NUMBER / EXTENSION)
☐ FAX
☐ MOBILE (AREA CODE / NUMBER / TIME TO CALL)

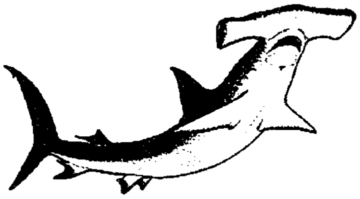
TELEPHONED		PLEASE CALL	✓
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED

TOPS FORM 3002C

Libby



FAX

818/999-4262

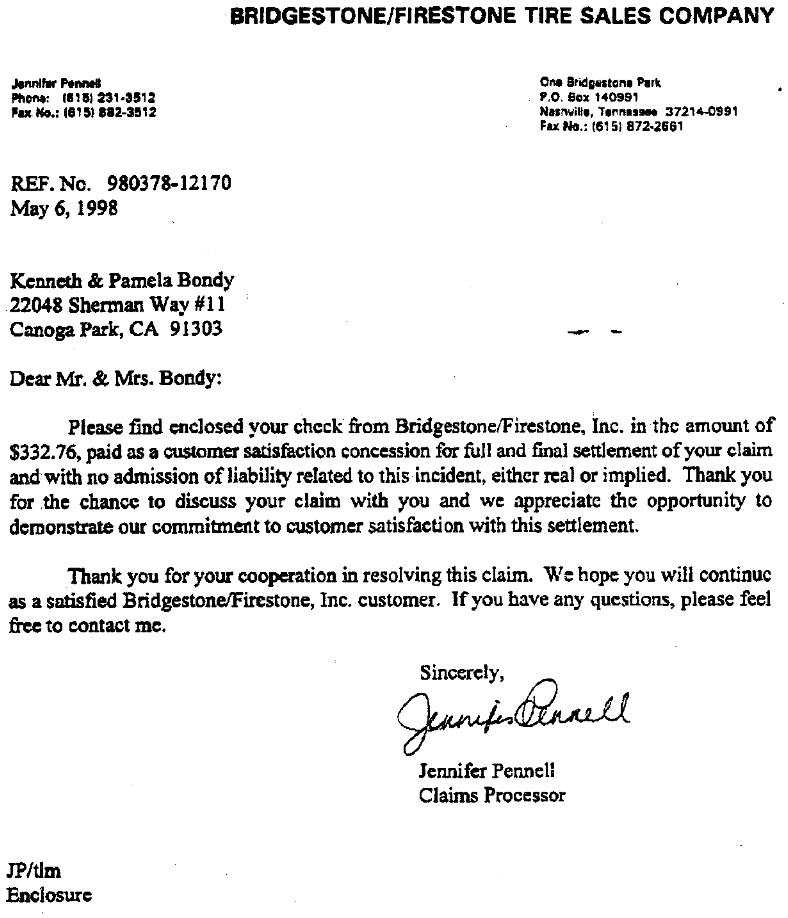
☐ 0 Pages Follow

DATE: 5-5-98
TO: LIBBIE KAKALES
FROM: Ken Bondy

REFERENCE No. 980354-12170

Hi Libbie:
I dropped off the tire on April 30, 1998 at your Canoga Park store (on Topanga Canyon Blvd.). The manager called you and left a message on your machine.

Ken Bondy



BRIDGESTONE/FIRESTONE TIRE SALES COMPANY

Jennifer Pennell
Phone: (615) 231-3512
Fax No.: (615) 882-3512

One Bridgestone Park
P.O. Box 140991
Nashville, Tennessee 37214-0991
Fax No.: (615) 872-2661

REF. No. 980378-12170
May 6, 1998

Kenneth & Pamela Bondy
22048 Sherman Way #11
Canoga Park, CA 91303

Dear Mr. & Mrs. Bondy:

Please find enclosed your check from Bridgestone/Firestone, Inc. in the amount of $332.76, paid as a customer satisfaction concession for full and final settlement of your claim and with no admission of liability related to this incident, either real or implied. Thank you for the chance to discuss your claim with you and we appreciate the opportunity to demonstrate our commitment to customer satisfaction with this settlement.

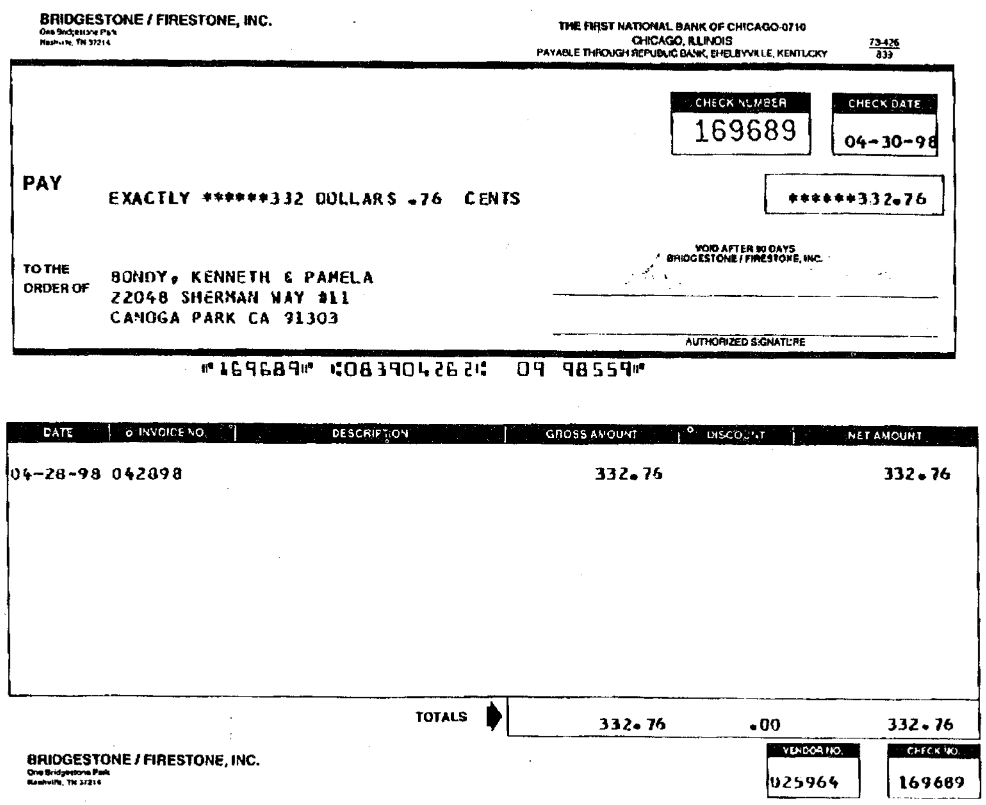
Thank you for your cooperation in resolving this claim. We hope you will continue as a satisfied Bridgestone/Firestone, Inc. customer. If you have any questions, please feel free to contact me.

Sincerely,

Jennifer Pennell

Jennifer Pennell
Claims Processor

JP/tlm
Enclosure



BRIDGESTONE / FIRESTONE, INC.
One Bridgestone Park
Nashville, TN 37214

THE FIRST NATIONAL BANK OF CHICAGO-0710
CHICAGO, ILLINOIS
PAYABLE THROUGH REPUBLIC BANK, SHELBYVILLE, KENTUCKY

73-426/833

CHECK NUMBER	CHECK DATE
169689	04-30-98

PAY EXACTLY ******332 DOLLARS .76 CENTS

******332.76

TO THE ORDER OF
BONDY, KENNETH & PAMELA
22048 SHERMAN WAY #11
CANOGA PARK CA 91303

VOID AFTER 90 DAYS
BRIDGESTONE / FIRESTONE, INC.

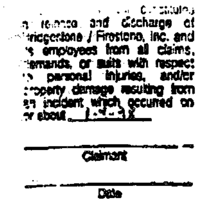
AUTHORIZED SIGNATURE

⑈169689⑈ ⑆083904262⑆ 09 98559⑈

DATE	INVOICE NO.	DESCRIPTION	GROSS AMOUNT	DISCOUNT	NET AMOUNT
04-28-98	042898		332.76		332.76
		TOTALS	332.76	.00	332.76

VENDOR NO.	CHECK NO.
025964	169689

BRIDGESTONE / FIRESTONE, INC.
One Bridgestone Park
Nashville, TN 37214



constituting a release and discharge of ridgestone / Firestone, Inc. and s employees from all claims, emands, or suits with respect personal injuries, and/or roperty damage resulting from n incident which occurred on r about [illegible]

Claimant

Date

THE RECENT FIRESTONE TIRE RECALL ACTION, FOCUSING ON THE ACTION AS IT PERTAINS TO RELEVANT FORD VEHICLES

THURSDAY, SEPTEMBER 21, 2000

HOUSE OF REPRESENTATIVES,
COMMITTEE ON COMMERCE,
SUBCOMMITTEE ON TELECOMMUNICATIONS, TRADE,
AND CONSUMER PROTECTION, AND THE
SUBCOMMITTEE ON OVERSIGHT AND INVESTIGATIONS,
Washington, DC.

The subcommittees met, pursuant to notice, at 9:15 a.m., in room 2123, Rayburn House Office Building, Hon. W.J. "Billy" Tauzin (chairman, Subcommittee on Telecommunications, Trade and Consumer Protection) presiding.

Members present, Subcommittee on Telecommunications, Trade, and Consumer Protection: Representatives Tauzin, Oxley, Stearns, Gillmor, Cox, Deal, Largent, Cubin, Shimkus, Wilson, Fossella, Ehrlich, Bliley (ex officio), Markey, Gordon, Rush, Engel, Wynn, Luther, Sawyer, Green, McCarthy, and Dingell (ex officio).

Members present, Subcommittee on Oversight and Investigations: Representatives Upton, Cox, Burr, Bilbray, Ganske, Bryant, Bliley (ex officio), Stupak, Green, McCarthy, and Dingell (ex officio).

Staff present: Tom DiLenge, majority counsel; Anthony Habib, legislative clerk; and Edith Holleman, minority counsel.

Mr. TAUZIN. The subcommittee will please come to order. We will ask all our guests to take seats and catch the outer doors so we can have the attention of all the members. Ladies and gentlemen, the subcommittee today meets again in joint session with the Oversight and Investigations Subcommittee, chaired by my good friend, Fred Upton, to continue our investigation into the Firestone recall and to complete the inquiry with reference to the one area that was unfortunately left blank in our previous hearing. That is the area of testing.

If you recall in the previous hearing, the witnesses for both Ford and for Firestone were at that time unprepared to give us documents as to what testing of these tires that are currently subject to the recall occurred, going back to the preproduction days and through the production cycle. And since that time, as of Friday, we had asked both Ford and Firestone to submit to us as much documentation as possible on that testing. I want to report first to the committee that as of Friday, both Ford and Firestone basically complied with our requests, although Ford has indicated it is yet unable to find and produce for us documentation of tests that occurred in the time period, I believe, 1995 and 1996, and we are still obviously waiting for that documentation; and that Firestone has yet to produce for us some of the audit reports dealing with—I am told they produced it late last night—the audit reports dealing with the audit reviews of the tire manufacturer, particularly at the Decatur plant. My understanding is that information has been delivered as of last night.

Obviously for all of our guests and our members, I think we owe again a debt of thanks to our investigators, both the Democratic and Republican investigators who are combing through these many thousands of documents that have been presented to us. But we have learned something since the last meeting of our two subcommittees that I think we ought to first put on the record.

First of all, we have received a letter from Jack Nasser of the Ford Motor Company correcting his sworn testimony that was presented to us at our last hearing. In the letter dated September 19, 2000, Mr. Nasser is informing us that contrary to his testimony where he said that Ford had indeed requested Firestone to conduct high speed tests at 26 pounds per square inch of tire that is subject to the recall, I quote his statement today: "Based on the information available to me at this time, I responded that Ford did request such tests, as noted in the letter to the subcommittee dated September 15, 2000 from Ford executives Helen Petrauskas and Thomas Baughman and the testing documents which Ford has provided the subcommittee. That answer appears not to be accurate with respect to the early division of responsibility."

In short, Ford, not Firestone, he now says, performed high speed testing on tires at 26 pounds per square inch at the Arizona proving grounds. So that's Mr. Nasser's written letter now which confirms that Ford did not ask Firestone to do testing of Ford Explorers at 26 pounds per square inch.

I would ask this letter be made part of the record in order to correct the earlier testimony of Mr. Nasser.

Second, the letter refers to testing that was supposedly done at the Arizona Proving Grounds. And we have the affidavit produced by Ford of James D. Avouris, a retired engineer at Ford who claims in the affidavit to have performed high speed durability tests in 1989 on a UN-46 Explorer.

I wish to state for the record, and we will allow Ford to explain this to us today, that our investigators interviewed Mr. Avouris who has denied, with attorneys present, Ford attorneys present, that the testing involved an Explorer. He has corrected this affidavit, which he signed, in oral examination by our investigators to the fact that the tests were not conducted on an Explorer, but rather were conducted on some sort of truck, not an Explorer.

The conclusion we have reached from his correcting his affidavit—and I would like the affidavit to be made a part of the record at this point, without objection, is that as far as we can tell to date, no one, not the NHTSA agency, nor Ford, nor Firestone, ever conducted high speed testing of Explorer automobiles fitted with Firestone tires subject to this recall and filled to 26 pounds per square inch—not before these tires were put on sale on Ford Explorers and, as far as we can tell, not during the production years of the Ford test data that was presented to us until very recently this year.

I wish to also state for the record that this morning I met with tire dealers who have brought some extraordinary information to me about the recalled tires that are coming in to their dealerships and the degree to which those tires are inflated, and they are preparing a written memorandum that they will submit as part of the record of this committee.

I would like to inform the committee that the evidence they have orally presented to me indicates that tires are being brought in by consumers that are filled as low as 15 pounds per square inch; 15, 20, 22, they tell me, is fairly average, which indicates that consumers advised to fill their tires and maintain them at 26 in fact maintain them at quite a different level.

And finally, I wish to point out that Ford, while in the early days of this sad and horrendous saga, in responding to KHOU's television report in which the television station connected the dots and first saw this tragedy of tire failures on Ford Explorers and reported it to the public, Ford responded it was the consumers' fault for not filling their tires and not maintaining their tires properly, is challenged by documents presented to me last night of depositions taken of one of the Ford chief executives who admitted in the deposition that he himself had not checked his tires but one time in 13,000 miles, indicating that it is not likely that consumers do, in fact, check their tire pressures as often as even Ford recommends.

Let me finally say that we will focus today on the issue of tire testing. We will focus today on what really occurred during the early years of production and design of Ford Explorers and production and design of the tires that were spec'd by Ford and produced by Firestone for those automobiles and other automobiles and SUV's. We will focus on activities that occurred in 1996 at the Decatur plant where apparently most of these failures occurred, where quality control testing indicates a level of failure that we will discuss this morning that seems to be rather large.

And we understand there is some dispute this morning as to what was tested. We do know 229 tires were tested in 1996 and the failure rate on those tires was extraordinary. Whether they were preproduction tires or production tires we will discuss this morning. But we understand a large percentage of failures were tire separation failures, and that Firestone in 1996 obviously was aware they had a problem with tire separation in the tires being produced at the Decatur plant especially, and that nevertheless that information never reached NHTSA and there certainly was not a decision to recall tires made at the plant under the system.

Second, we will hear this morning and file into the record evidence that Firestone obviously made corrections in the production of their tires in 1997 and 1998: in 1997, in the wall of thickness, obviously, to deal with a sidewall problem experienced in this 1996 testing period; and in 1998, some sort of wedge was added to the tires in question here as well as other tires, which wedge we understand helps prevent or helps with the problem of tire separation.

So we do know from the evidence submitted to this committee, as we can discern it to this point, that No. 1, neither Firestone nor

Ford tested Ford Explorers with Firestone tires subject to this recall at high speed test at 26 pounds per square inch; that, while testing occurred, it occurred in other vehicles and very often in other types of conditions.

Second, we learned that quality control testing at the Decatur plant indicated a high rate of failure in those tests, and much of that failure was due to tire separation, and in 1998 changes were made in the design of the tire, which for whatever reason they were made, did have the effect of helping the tire separation problems.

We also know that several million tires were produced at the Decatur plant in 1996 and again in 1997. The question this committee would like to have answered from Ford and from Firestone in particular this morning is why weren't these tires tested under real conditions of use and recommended expected use by consumers? And when testing did occur in 1996, indicating high levels of failure, why did Firestone not report those test reports to NHTSA? Why did those tires in production continue to go into production? Why did consumers continue to ride on tires which Firestone in 1996 obviously had knowledge could contain defects that could result in the kind of catastrophic failures we have seen?

So we will have a series of very important questions to be answered by our witnesses today. We are pleased that both Ford and Firestone have sent witnesses prepared to answer those questions, as well as to recognize and welcome Dr. Bailey again of our highway safety agency, NHTSA, here to continue our discussions of how this problem occurred and how we might move on.

Finally, Senator McCain opened his hearings the same way we opened our hearings last week. He opened it by announcing that while we are on a mission to find out what went wrong so that we can ensure that it doesn't happen again, so we can fix the right problems, we are not about the business of finding liability or fixing blame. Someone else will do that, somewhere else.

Today we will continue that mission of finding out what went wrong in the testing procedures, what went wrong when tests were conducted and information apparently did not reach the right eyes and ears, and what went wrong in the process by which these tires were allowed to remain on the market and eventually result in the kind of failure rate that has now, according to NHTSA, Dr. Bailey, resulted in a potential loss of 103 American lives and hundreds of serious injuries and over 800 new accounts of incidence of failure of these tires on the highways in America.

I will ask all members to cooperate with me in this respect. We will have opening statements by any members desiring to file—desiring to make opening statements. I will ask members, however, to think about abbreviating those opening statements or even filing them into the record this morning.

As a quid pro quo, what we will do is by unanimous consent, which I will make right now, we will change our normal 5-minute rule to a 10-minute rule on the round of questions, since we have all our witnesses on the single panel. If you will help me and cooperate with me in moving to questions and presentation of testimony as quickly as we can, I will now ask unanimous consent that when we move to a round of questions that every member be recognized for 10 minutes for questions. Is there any objection? Then it is so ordered.

Mr. STUPAK. Mr. Chairman if I may. In your opening statement, you indicated you had a letter from Mr. Nasser. I figure that's going to be part of the record. But in your opening you mentioned a number of other documents you received last night. I would ask that before they be made a part of the record, we all get a chance to see them. I am not sure if you're offering them in there at this time or if you plan on offering them later. We would just like to see them.

Mr. TAUZIN. The gentleman makes a very valid request. And we have tried our best to share documents before they are entered. We will continue to do so. We have not entered them in the record yet. I simply referred to them because that is the report of our bipartisan investigative staff as of this date.

Second, I wish to report that we have received calls about a visit from Secretary Slater who is scheduled to be here later this morning, and that when he does appear, I will ask the committee to make accommodations to hear his testimony as he has agreed to come—I am grateful for that—and agreed to present the Department's recommendations on legislation which, as you know, we have announced that at 1 o'clock we will begin the process of marking up the Upton bill to correct the problems that this investigation has and continues to uncover in this failed process.

The Chair now yields back the balance of its time and recognizes the gentleman, Mr. Markey, for an opening statement.

Mr. MARKEY. Thank you, Mr. Chairman, very much. And I commend you for holding this very important additional hearing. Obviously, new information continues to flow into this subcommittee. We are learning more by the day about what the whole history of this lethal combination of Ford Explorers and Firestone tires has meant not only for Americans but for people all over the world. We know that all over this country, tens, if not hundreds of thousands of families, are going back to their dealerships and asking for an exchange of tires and being told that those tires are not available.

We know that there are heated arguments which are taking place in dealerships all across this country with families telling the dealers to just take the leased vehicle back and let them have the vehicle that the dealer is driving their family to work with; and in turn, the dealer could drive their family to work in their Ford Explorer with Firestone tires, in order to fully paradox those Americans who do not wish to run the risk of endangering their own families in riding in these vehicles.

The anecdotes are flowing into the subcommittee and obviously families across this country are justifiably angry at the danger which they have been placing their own family members under.

We also know that because of the instability of the Ford Explorer with the 26 pound per square inch, much less 32 pound per square inch inflation of Firestone tires, that consumers, family members, the mothers and fathers, feel the instability in the car. And so it makes sense that they would continue to deflate their tires, thinking perhaps that that would add more stability to their car. They would feel that in fact on the turns in some kind of stressful situation on the road that they had more protection for their family, without realizing, of course, that in fact they were creating more danger for their family, because when these tires are deflated in combination with the instability of the Ford Explorer on hot pavement that, in fact, they were creating even more danger.

None of this, of course, was told to mothers and fathers as they purchased these vehicles with the intent of actually creating a safer environment for their families. So naturally there is a great deal of anger; I mean real anger across the country. Millions of Americans, mothers and fathers, have gone out into their driveway in the last several weeks to check their tires maybe for the first time, never believing that there was any danger, thus resulting in something that has touched a nerve in all of America; in the families, in the mothers' and fathers' hearts across the country. They trust their government to ensure that their families are protected. They trust corporate America not to engage in reckless behavior.

What we are now learning, of course, is that both Ford and Firestone had information long in advance of the point in time that they told NHTSA that there could be problem. Now, that is very troubling for this committee. We have a responsibility as a Congress to ensure that we now put in place the kinds of protections which families will expect us to put in place. We have to have a rollover standard. We have to have a meaningful rollover standard that is going to guarantee that we will not see a repetition of this kind of a problem. We have to give authority and a mandate to NHTSA to do this job.

We need a new tire standard. We can't believe here honestly that we have to go back to 1968 to have a standard which has been put on the books. It almost defies belief. We have to increase the funding for NHTSA. We have to make sure that the safety agency responsible for protecting every single American family on the road has the resources they need to conduct any test and every test which they believe they have to in order to ensure that American families are protected.

The results of these tests have to be posted in the dealership of every single car manufacturer in the United States. When someone goes in to buy a car or an SUV or a minivan, they should be able to look right there and know what in fact the danger is for their family. There should be a grade which every one of these vehicles, in combination with a particular set of tires, has been given; because, in fact, that is why people buy these vehicles: to protect their families. This little extra edge that they are going to have over everybody else on the road—in fact, they were giving themselves less of an edge; they were in fact endangering their families, not making them safer. How ironic is that for a family paying extra for a vehicle?

So they are angry; they are really angry—and justifiably angry, mothers and fathers all across this country.

So today, Mr. Chairman, we are undertaking, I think, an historically important markup. And we have a chance now to revisit 20 years, 32 years of inactivity. We have to do the job that ensures that we have filled in the gaps that have allowed public safety to be put at risk over this past decade, it turns out. And we have to make sure that not only the industry but the agency with safety and responsibility is given all of the power, all of the resources, it will need to be a truly vigilant watchdog of safety, which the public has always thought it was; although in retrospect, obviously it was not.

So, Mr. Chairman, I thank you so much for calling this hearing today. We will be marking up the bill today, obviously, beginning that process. But in doing so, I would urge all members on both sides to reserve the right to continue to modify their views as to what should be included in legislation.

We are obviously at the full committee level still going to have to make further modifications, because this is a moving story, a fast-moving story as information becomes available to all members. And so as we begin today at the subcommittee level, I hope that all members realize that we still do not know everything that we are going to know in terms of this legislative process. But we are constrained by the fact that we are going to adjourn in 3 weeks. We are going to have to do the very best we can, but be open-minded and flexible in terms of how we are going to amend this legislation on the fly, reflecting on the new information which we are picking up in order to ensure that we are giving the maximum amount of comfort to families that want to feel that next year when they are walking into these showrooms, that their vehicles are safe.

I yield back the balance of my time.

Mr. TAUZIN. I thank the gentleman.

Let me, before I move on, express the thanks from both Mr. Upton and I to the gentleman from Massachusetts, as well as Mr. Stupak and Mr. Dingell, for the extraordinary cooperation that we are receiving in terms of both this inquiry and the process we start at 1 o'clock this afternoon in actually producing legislation. I hope everyone understands there is a lot of waiving of time limitations so we can get about the business of, in the next 3 weeks, completing legislation. And all of the members on both sides are to be given thanks again for their extraordinary patience and cooperation in moving this process along despite the normal time restrictions.

And before I introduce the chairman of the full committee, Mr. Bliley, for his opening statement, let me correct the record. We have gotten Mr. Stupak a copy of that deposition. It is a deposition of Bob Wyatt of Firestone, not Ford. I apologize. In his deposition, Bob Wyatt, who testified at our last hearing on September 25, 2000—Bob Wyatt is a VP for Quality Assurance at Firestone—and the deposition, as I pointed out, points out that even the VP of Firestone was only checking his tire pressure once in 13,000 miles. And that deposition will be shared with the minority before it is entered in to the record.

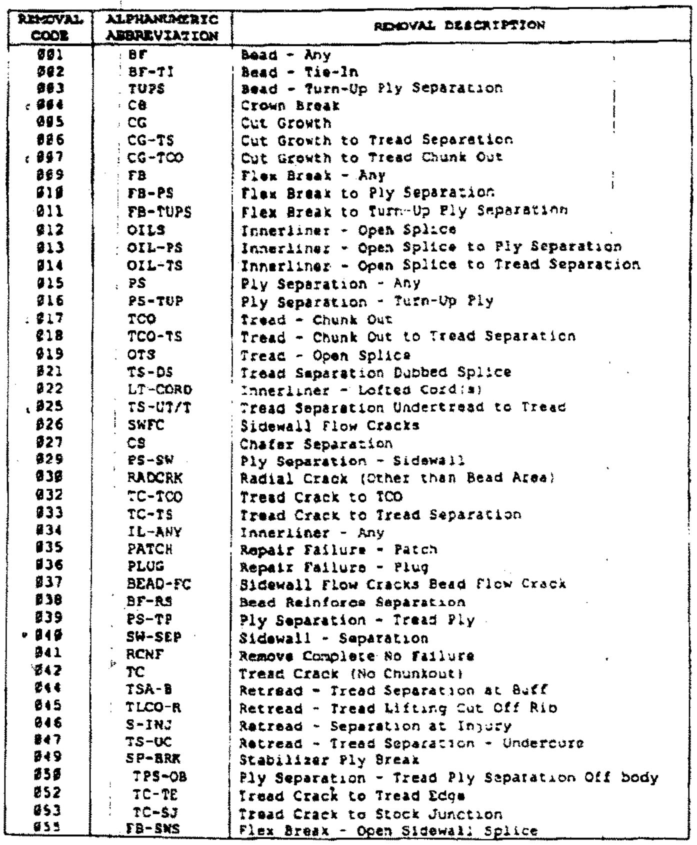
Let me ask for unanimous consent that the book of documents that has been reviewed by the minority and the majority, which contains the documents that will be filed in the record today and contains the documents I referred to—which the letter of Mr. Nasser is number 18 and the affidavit of James Avouris is number 19 for your reference—I would ask that this book of documents, already reviewed and approved I believe by the minority, be made a part of the record. Is there any objection?

Mr. STUPAK. Mr. Chairman, we have two documents that have been shared with the majority: One about car engineering and another document. We just ask they be made part of the record.

Mr. TAUZIN. Is there any objection to the unanimous consent made by the Chair? Hearing none, it is so ordered.

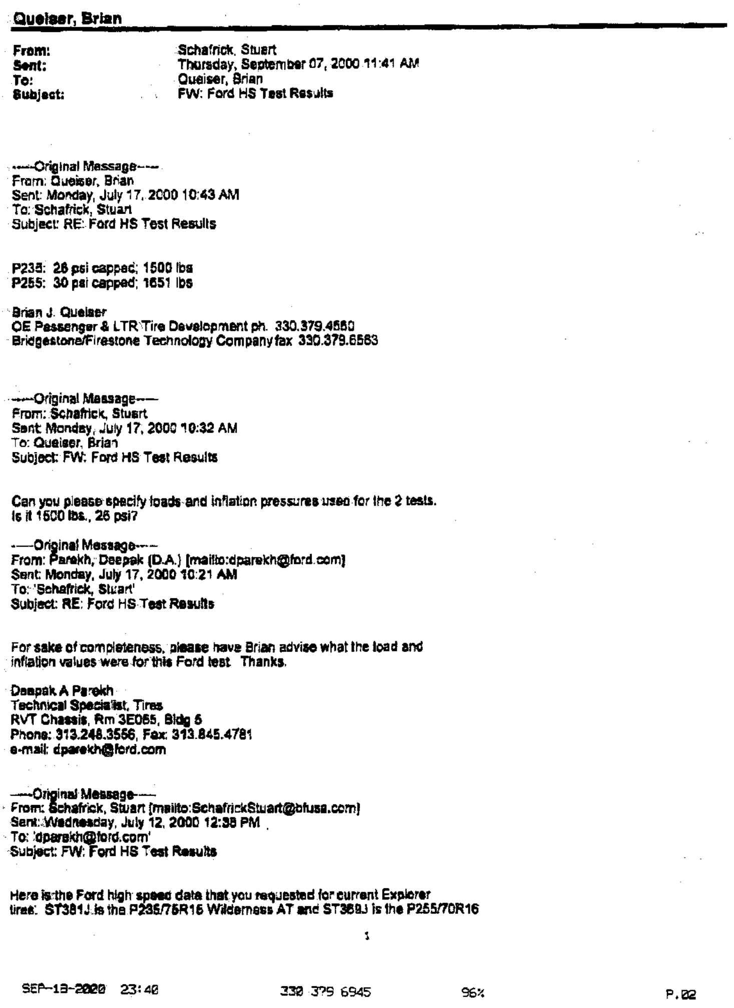
The gentleman, Mr. Stupak, makes unanimous consent request to add additional documents to the record. And is there any objection? Without objection, it is so ordered.

[The documents referred to follow:]



REMOVAL CODE	ALPHANUMERIC ABBREVIATION	REMOVAL DESCRIPTION
001	BF	Bead - Any
002	BF-TI	Bead - Tie-In
003	TUPS	Bead - Turn-Up Ply Separation
004	CB	Crown Break
005	CG	Cut Growth
006	CG-TS	Cut Growth to Tread Separation
007	CG-TCO	Cut Growth to Tread Chunk Out
009	FB	Flex Break - Any
010	FB-PS	Flex Break to Ply Separation
011	FB-TUPS	Flex Break to Turn-Up Ply Separation
012	OILS	Innerliner - Open Splice
013	OIL-PS	Innerliner - Open Splice to Ply Separation
014	OIL-TS	Innerliner - Open Splice to Tread Separation
015	PS	Ply Separation - Any
016	PS-TUP	Ply Separation - Turn-Up Ply
017	TCO	Tread - Chunk Out
018	TCO-TS	Tread - Chunk Out to Tread Separation
019	OTS	Tread - Open Splice
021	TS-DS	Tread Separation Dubbed Splice
022	LT-CORD	Innerliner - Lofted Cord(s)
025	TS-UT/T	Tread Separation Undertread to Tread
026	SWFC	Sidewall Flow Cracks
027	CS	Chafer Separation
029	PS-SW	Ply Separation - Sidewall
030	RADCRK	Radial Crack (Other than Bead Area)
032	TC-TCO	Tread Crack to TCO
033	TC-TS	Tread Crack to Tread Separation
034	IL-ANY	Innerliner - Any
035	PATCH	Repair Failure - Patch
036	PLUG	Repair Failure - Plug
037	BEAD-FC	Sidewall Flow Cracks Bead Flow Crack
038	BF-RS	Bead Reinforce Separation
039	PS-TP	Ply Separation - Tread Ply
040	SW-SEP	Sidewall - Separation
041	RCNF	Remove Complete No Failure
042	TC	Tread Crack (No Chunkout)
044	TSA-B	Retread - Tread Separation at Buff
045	TLCO-R	Retread - Tread Lifting Cut Off Rib
046	S-INJ	Retread - Separation at Injury
047	TS-UC	Retread - Tread Separation - Undercure
049	SP-BRK	Stabilizer Ply Break
050	TPS-OB	Ply Separation - Tread Ply Separation Off body
052	TC-TE	Tread Crack to Tread Edge
053	TC-SJ	Tread Crack to Stock Junction
055	FB-SNS	Flex Break - Open Sidewall Splice

REMOVAL CODE	ALPHANUMERIC ABBREVIATION	REMOVAL DESCRIPTION
056	RCRA-C	Bead - Radial Cracks Reinforce Area to Cords
057	RCRA	Bead - Radial Cracks Reinforce Area
058	IAP-LOS	Internal Air Pressure Loss
059	WTSH	Tread - Wire Through the Shoulder
060	SW-REP	Repair Failure - Sidewall
061	BD-REP	Repair Failure - Bead
062	BH-REP	Repair Failure - Bead Heel
063	IL-REP	Repair Failure - Innerliner
064	ILOBO	Lofted Cord(s)
065	ILCRK	Cracking
066	PS-TD	Ply Separation - Between Body Plies (Tread)
067	CIRCRK	Circumferential Crack
068	DIACRK	Diagonal Crack
069	TS-BES	Tread Sep - Off Belt Skim
070	TS-BEC	Tread Sep - Off Belt Cords
071	TS-BOS	Tread Sep - Off Body Skim
072	TS-BOC	Tread Sep - Off Body Cords
073	PS-BEC	Belt Ply Sep Between Belts (Off Cords)
074	PS-BOS	Belt Ply Sep Off Body Skim
075	TS-BE	Sep - Tread Off Outer Belt
076	PS-BEA	Sep Between #1 and #2 Belt
077	PS-BEB	Sep Between #2 and #3 Belt
078	PS-BED	Sep Between #3 and #4 Belt
079	SEBPI	Sep - #1 Belt Off Belt Ply Insert
080	BPI-OBO	Sep - Belt Ply Insert Off Body
081	TS-BS	Sep - Tread Off Burlington Strip
082	SEBS	Sep - Burlington Strip Off Belts
083	SEBPF	Sep - Off Belt Ply Filler (Truck Radial)
084	SEP-VEN	Veneer Sep - Off WSW
085	BCHAF	Bead Chafe
089	FAILED	Failed DOT Dimensional Checks (Passenger Only)
090	PASSED	Passed (Truck Plunger & SLR Only)
091	FAILED	Failed (Truck Plunger & SLR Only)
092	CB/TS-BEC	Crown Break: Tread Sep - Off Belt Cords
093	CB/TS-BES	Crown Break: Tread Sep - Off Belt Skim
094	CB/TS-BOC	Crown Break: Tread Sep - Off Body Cords
095	CB/TS-BOS	Crown Break: Tread Sep - Off Body Skim
096	CB/PS-TD	Crown Break: Ply Sep - Between Body Plies
097	CB/PS-BEC	Crown Break: Ply Sep - Between Belts
098	CB/PS-BES	Crown Break: Ply Sep - Off Belt Skim
900	RIM-F	Rim Failure
901	VOIDED	Voided Test - Machine Failure
902	VOIDED	Voided Test - Temperature O.O.T.
903	VOIDED	Voided Test - Incorrect Load
904	VOIDED	Voided Test - Incorrect Speed
905	VOIDED	Voided Test - Incorrect Inflation
906	VOIDED	Voided Test - Factory Defect
907	VOIDED	Voided Test - Other
908	VOIDED	Voided Test - Tube Failure



Queiser, Brian

From: Schafrick, Stuart
Sent: Thursday, September 07, 2000 11:41 AM
To: Queiser, Brian
Subject: FW: Ford HS Test Results

-----Original Message-----
From: Queiser, Brian
Sent: Monday, July 17, 2000 10:43 AM
To: Schafrick, Stuart
Subject: RE: Ford HS Test Results

P235: 26 psi capped; 1500 lbs
P255: 30 psi capped; 1651 lbs

Brian J. Queiser
OE Passenger & LTR Tire Development ph. 330.379.4560
Bridgestone/Firestone Technology Company fax 330.379.6563

-----Original Message-----
From: Schafrick, Stuart
Sent: Monday, July 17, 2000 10:32 AM
To: Queiser, Brian
Subject: FW: Ford HS Test Results

Can you please specify loads and inflation pressures used for the 2 tests.
Is it 1500 lbs., 26 psi?

-----Original Message-----
From: Parekh, Deepak (D.A.) [mailto:dparekh@ford.com]
Sent: Monday, July 17, 2000 10:21 AM
To: 'Schafrick, Stuart'
Subject: RE: Ford HS Test Results

For sake of completeness, please have Brian advise what the load and inflation values were for this Ford test. Thanks.

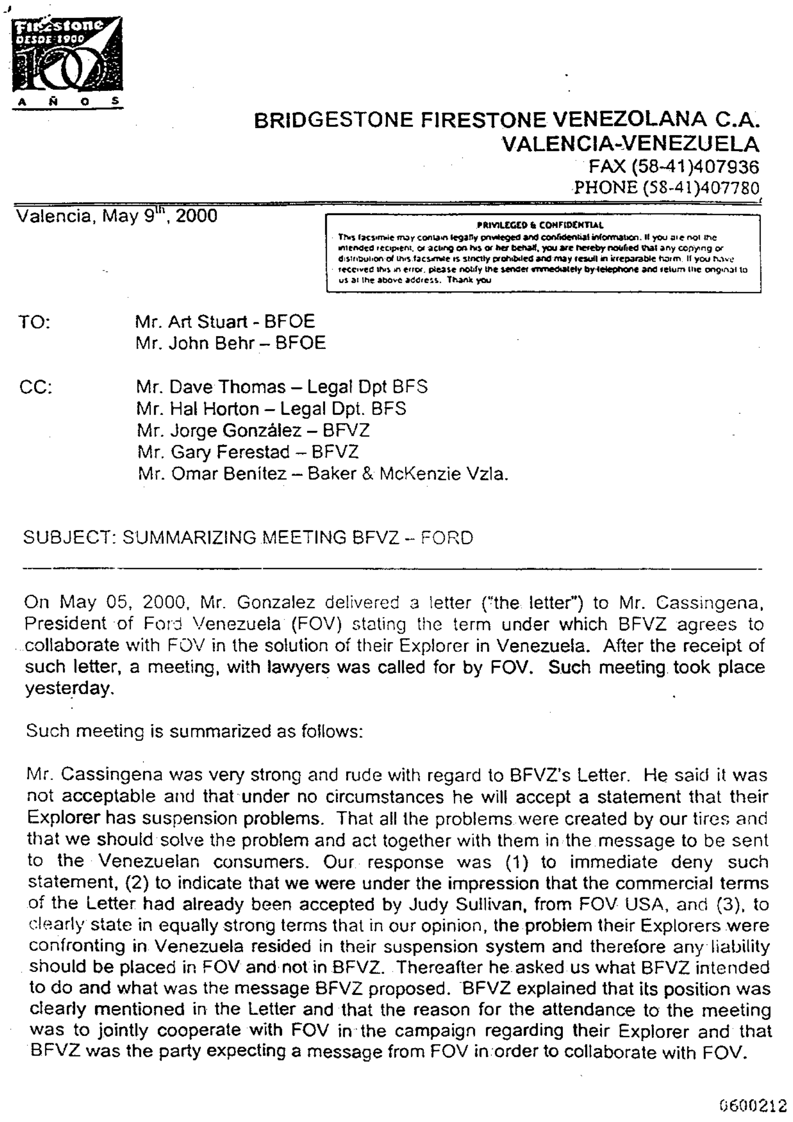
Deepak A Parekh
Technical Specialist, Tires
RVT Chassis, Rm 3E065, Bldg 5
Phone: 313.248.3556, Fax: 313.845.4781
e-mail: dparekh@ford.com

-----Original Message-----
From: Schafrick, Stuart [mailto:SchafrickStuart@bfusa.com]
Sent: Wednesday, July 12, 2000 12:38 PM
To: 'dparekh@ford.com'
Subject: FW: Ford HS Test Results

Here is the Ford high speed data that you requested for current Explorer tires: ST381J is the P235/75R15 Wilderness AT and ST369J is the P255/70R16

Wilderness AT. Let me know if you have any questions.

> -----Original Message-----
> From: Queiser, Brian
> Sent: Wednesday, July 12, 2000 10:17 AM
> To: Schafrick, Stuart
> Subject: Ford HS Test Results
>
> Per Deepak's request:
>
> Tested using Ford ES high speed criteria (for UN150):
>
> ST381J (4) tires: 8' @ 112 mph
> 6' @ 112 mph
> 5' @ 112 mph
> 8' @ 112 mph
>
> ST369J (4) tires: 6' @ 112 mph
> 6' @ 112 mph
> 3' @ 112 mph
> 9' @ 112 mph
>
> Target = 10' @ 108 mph
>
> Later,
>
> Brian J. Queiser
> OE Passenger & LTR Tire Development ph. 330.379.4560
> Bridgestone/Firestone Technology Company fax 330.379.6563
>
>



Firestone DESDE 1900 100 AÑOS

BRIDGESTONE FIRESTONE VENEZOLANA C.A.
VALENCIA-VENEZUELA
FAX (58-41)407936
PHONE (58-41)407780

Valencia, May 9th, 2000

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TO: Mr. Art Stuart - BFOE
Mr. John Behr – BFOE

CC: Mr. Dave Thomas – Legal Dpt BFS
Mr. Hal Horton – Legal Dpt. BFS
Mr. Jorge González – BFVZ
Mr. Gary Ferestad – BFVZ
Mr. Omar Benítez – Baker & McKenzie Vzla.

SUBJECT: SUMMARIZING MEETING BFVZ – FORD

On May 05, 2000, Mr. Gonzalez delivered a letter ("the letter") to Mr. Cassingena, President of Ford Venezuela (FOV) stating the term under which BFVZ agrees to collaborate with FOV in the solution of their Explorer in Venezuela. After the receipt of such letter, a meeting, with lawyers was called for by FOV. Such meeting took place yesterday.

Such meeting is summarized as follows:

Mr. Cassingena was very strong and rude with regard to BFVZ's Letter. He said it was not acceptable and that under no circumstances he will accept a statement that their Explorer has suspension problems. That all the problems were created by our tires and that we should solve the problem and act together with them in the message to be sent to the Venezuelan consumers. Our response was (1) to immediate deny such statement, (2) to indicate that we were under the impression that the commercial terms of the Letter had already been accepted by Judy Sullivan, from FOV USA, and (3), to clearly state in equally strong terms that in our opinion, the problem their Explorers were confronting in Venezuela resided in their suspension system and therefore any liability should be placed in FOV and not in BFVZ. Thereafter he asked us what BFVZ intended to do and what was the message BFVZ proposed. BFVZ explained that its position was clearly mentioned in the Letter and that the reason for the attendance to the meeting was to jointly cooperate with FOV in the campaign regarding their Explorer and that BFVZ was the party expecting a message from FOV in order to collaborate with FOV.

①

FOV officers came very strong indicating that their Explorers did not have any problem, that they comply with all legal requirements and standards in the USA and Venezuela and that the accidents that have taken place in Venezuela are due to the BFVZ Wilderness tire. Such statements were rejected by us indicating that a good number of accidents have taken place with tires other that BFVZ tires and that they have been modifying their Explorers' suspension. We explained to them the cause of many of the accidents and that we do not feel responsible at all. At this stage, FOV officers tried to point out that BFVZ had not educated the Venezuelan consumer as to tires maintenance. This was completely rejected and an explanation as to how such education is carried was given. A long discussion followed on issues that pretended to be evidence supplied by FOV trying to place the cause of the accidents in BFVZ's tires. Again, such liability was completely rejected and general specification of certain accidents and the causes therefore were given.

Thereafter, BFVZ insisted that it was our understanding that the reason for the meeting was to find as amicable joint solution for FOV's Explorer problems and the type of campaign to be adopted, irrespective of whatever had happened. For that purpose BFVZ had sent the Letter and proposed a new tire and the commercial terms for its purchase, all of that subject to the change in the suspension system. At this point in the time, FOV suggested that we use our distribution chain in order to proceed to change Firestone tires on all of the 1996, 1997, 1998 and mid 1999 FOV's Explorers, without them accepting any of the commercial terms and without any change in the suspension system. This was completely rejected because (1) it gave the subliminal message that the cause for the accidents was BFVZ's tires, (2) they are referring to a Recall of the Explorers' tires which recall is not our responsibility and we are not going to do so, and (3) we believed the cause of the accidents was a design failure in the suspension system and thus they were the ones that should make the proposal. For this latter purpose they should use their distribution chain and we will collaborate with them.

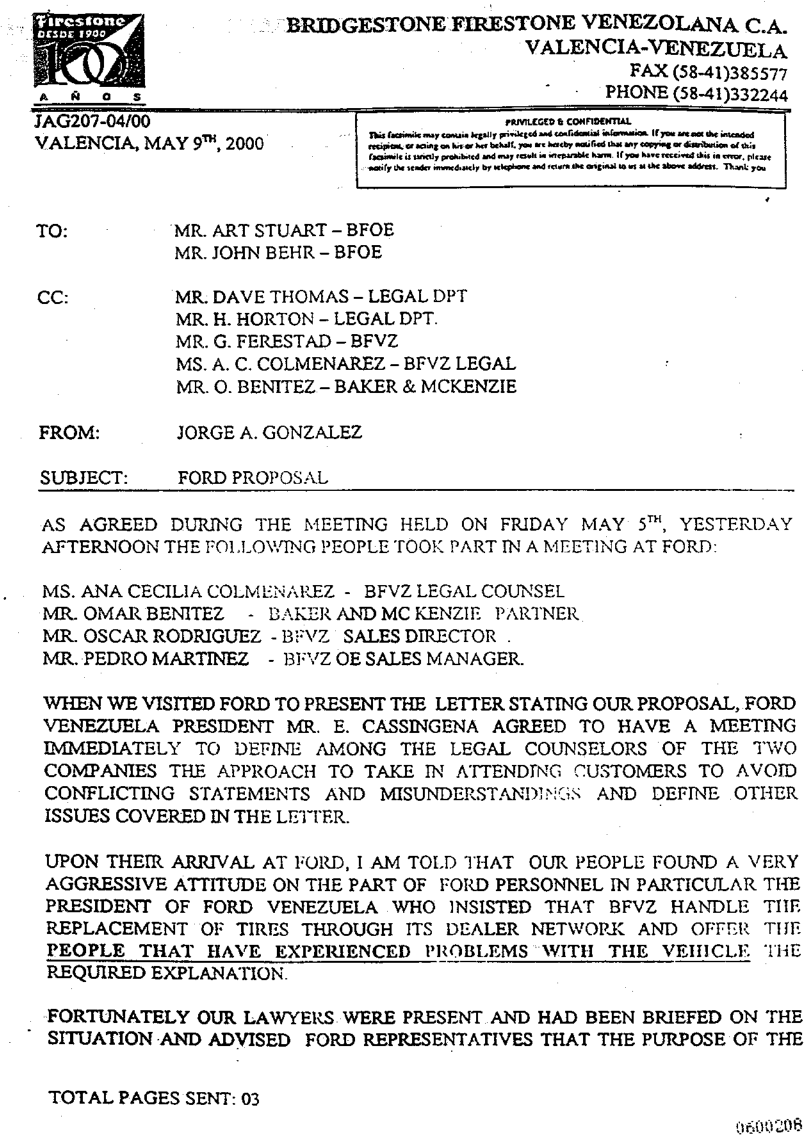
Immediately, we informed that any suggestions other than the proposals contained in the Letter should be consulted with Mr. Gonzalez and Mr. Ono. The meeting was called off but Mr. Cassingena informed Mr. Oscar Rodriguez, our Sales Director, that he should talk to Mr. Hector Rodriguez, FOV's Purchasing Director. In this conversation, Mr. Hector Rodriguez rejected the price proposed in the letter for the new tire and the use of such tire for their current vehicle.

Conclusion: No agreement has been reached. FOV is forced by time to come up with a quick and prompt solution because they have to testify next week before the State Attorney as to one accident that took place in Acarigua, Portuguesa State.

If you have any questions, please do not hesitate to contact me.

Regards,

Ana Cecilia Colmenárez
Manager of Legal Affairs of BFVZ



Firestone DESDE 1900 100 AÑOS

BRIDGESTONE FIRESTONE VENEZOLANA C.A.
VALENCIA-VENEZUELA
FAX (58-41)385577
PHONE (58-41)332244

JAG207-04/00
VALENCIA, MAY 9TH, 2000

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TO: MR. ART STUART – BFOE
MR. JOHN BEHR – BFOE

CC: MR. DAVE THOMAS – LEGAL DPT
MR. H. HORTON – LEGAL DPT.
MR. G. FERESTAD – BFVZ
MS. A. C. COLMENAREZ – BFVZ LEGAL
MR. O. BENITEZ – BAKER & MCKENZIE

FROM: JORGE A. GONZALEZ

SUBJECT: FORD PROPOSAL

AS AGREED DURING THE MEETING HELD ON FRIDAY MAY 5TH, YESTERDAY AFTERNOON THE FOLLOWING PEOPLE TOOK PART IN A MEETING AT FORD:

MS. ANA CECILIA COLMENAREZ - BFVZ LEGAL COUNSEL
MR. OMAR BENITEZ - BAKER AND MC KENZIE PARTNER
MR. OSCAR RODRIGUEZ - BFVZ SALES DIRECTOR .
MR. PEDRO MARTINEZ - BFVZ OE SALES MANAGER.

WHEN WE VISITED FORD TO PRESENT THE LETTER STATING OUR PROPOSAL, FORD VENEZUELA PRESIDENT MR. E. CASSINGENA AGREED TO HAVE A MEETING IMMEDIATELY TO DEFINE AMONG THE LEGAL COUNSELORS OF THE TWO COMPANIES THE APPROACH TO TAKE IN ATTENDING CUSTOMERS TO AVOID CONFLICTING STATEMENTS AND MISUNDERSTANDINGS AND DEFINE OTHER ISSUES COVERED IN THE LETTER.

UPON THEIR ARRIVAL AT FORD, I AM TOLD THAT OUR PEOPLE FOUND A VERY AGGRESSIVE ATTITUDE ON THE PART OF FORD PERSONNEL IN PARTICULAR THE PRESIDENT OF FORD VENEZUELA WHO INSISTED THAT BFVZ HANDLE THE REPLACEMENT OF TIRES THROUGH ITS DEALER NETWORK AND OFFER THE PEOPLE THAT HAVE EXPERIENCED PROBLEMS WITH THE VEHICLE THE REQUIRED EXPLANATION.

FORTUNATELY OUR LAWYERS WERE PRESENT AND HAD BEEN BRIEFED ON THE SITUATION AND ADVISED FORD REPRESENTATIVES THAT THE PURPOSE OF THE

TOTAL PAGES SENT: 03

MEETING WAS TO DEFINE THE STATEMENT TO BE ISSUED TO CUSTOMERS AND IT APPEARED THAT INSTEAD THEY WERE READY TO STATE THAT THE TIRE WAS THE

ONLY CAUSE OF THE PROBLEMS FACED WITH EXPLORERS AND WASH THEIR HANDS. OUR LAWYERS TOOK THIS OPPORTUNITY TO REMIND THEM THAT THE SAME TIRE IN THE SAME DESIGN "WILDERNESS", IS FITTED ON GRAND BLAZERS AND TOYOTA AUTANAS WHICH DO NOT ROLL OVER EVEN IN CASES OF TIRE FAILURE AND THAT IN THE CASE OF 15" TIRES ALL CHEVROLET BLAZERS ARE EQUIPPED WITH FIRESTONE TIRES AND THEY DO NOT ROLL OVER EITHER. AT THE END OF THE MEETING THEY ADVISED ALL PARTICIPANTS THAT THEY WOULD HAVE TO CONSULT WITH ME AND ULTIMATELY WITH OUR HEAD OFFICE. I HAVE ASKED OUR LAWYERS TO PREPARE A FULL REPORT OF THE MEETING AND FORWARD IT TO YOU AND H. HORTON IN CASE OF ANY FUTURE QUESTIONS.

IN A NUTSHELL, IT APPEARS THAT NOW FORD VENEZUELA WANTS TO TURN THE TABLES AND INSTEAD OF THIS BEING A PROPOSAL TO HELP RESOLVE A PROBLEM THEY WANT TO BLAME BRIDGESTONE FIRESTONE FOR THEIR PROBLEMS. BASED ON THE ITEMS DISCUSSED AT THE MEETING AND A CONVERSATION OF OUR SALES DIRECTOR, OSCAR RODRIGUEZ WITH FORD PURCHASING DIRECTOR MR. HECTOR RODRIGUEZ, FORD'S POSITION CAN BE DEFINED AS FOLLOWS:

- FOV WILL NOT INSTALL THE NEW TIRE ON THE NEW VEHICLES COMING OFF THE ASSEMBLY LINE.
- FOV WANTS THE TIRES AT NO CHARGE.
- FOV DOES NOT ACCEPT ANY CONDITIONS.
- THEY EXPECT BFVZ TO REPLACE THE TIRES, NO QUESTIONS ASKED. SIMILAR TO A "SILENT RECALL".
- OUR CONDITION OF CORRECTING THE SUSPENSION PRIOR TO INSTALLING THE NEW BRIDGESTONE TIRES IS NOT ACCEPTABLE TO THEM EVEN THOUGH FOV CONTINUES WITH THE SO CALLED ENHANCEMENT PROGRAM IN EFFECT THROUGHOUT VENEZUELA USING GOODYEAR TIRES, BUT IT APPEARS THAT THEY DO NOT WANT TO APPLY IT TO THE BRIDGESTONE TIRES. IT IS NOT CLEAR WHAT DO THEY INTEND TO DO

ONCE YOU HAVE SEEN THE REPORT FROM OUR LAWYERS, IT WOULD BE ADVISABLE TO LET FORD DEARBORN KNOW OF THE POSITION ADOPTED BY FOV. ALL ITEMS CONSIDERED, MY RECOMMENDATION IS THAT WE GO BACK TO JUDY SULLIVAN AND ADVISE THAT WE HAVE MADE THE OFFER BUT THEY DID NOT ACCEPT IT.

FROM OUR PERSPECTIVE, IF THEY DO NOT ACCEPT TO MODIFY THE SUSPENSION PRIOR TO INSTALLING THE NEW BRIDGESTONE TIRES, I DO NOT RECOMMEND TO GO AHEAD SINCE WE KNOW FOR A FACT THAT THE VEHICLE MAY ROLL OVER

TOTAL PAGES SENT: 03

Firestone DESDE 1900 100 AÑOS

BRIDGESTONE FIRESTONE VENEZOLANA C.A.
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FAX (58-41)385577
PHONE (58-41)332244

WITH ANY TIRE BRAND AND IT WOULD PUT IN JEOPARDY THE BRIDGESTONE BRAND IN VENEZUELA.

I SINCERELY QUESTION THEIR INTENTIONS PARTICULARLY CONSIDERING THAT THEY ARE GOING AHEAD WITH THE ENHANCEMENT PACKAGE INSTALLING AND CHARGING FOR GOODYEAR TIRES WHILE THEY ARE NOT WILLING TO DO IT WITH OUR PRODUCT AND IN ADDITION KNOWING THAT IN VENEZUELA THERE ARE MANY UNCONTROLLABLE FACTORS SUCH AS IGNORED SPEED LIMITS, EXTREME HEAT, POOR TIRE CARE, BAD TIRE REPAIRS, POOR ROADS AND A RECOMMENDED AIR PRESSURE ON THE EXPLORERS OF 28 PSI.

PLEASE ADVISE YOUR THOUGHTS AND RECOMMENDATION. CONSIDERING THAT FOV HAS BEEN MODIFYING THE SUSPENSION, OUR INTENTION WAS TO GO ALONG WITH YOUR PROPOSAL TO APPEASE AND HELP FORD DUE TO OUR LONG BUSINESS RELATIONSHIP BUT IT APPEARS THAT THEY WANT BRIDGESTONE FIRESTONE TO SOLVE THEIR PROBLEMS.

PLEASE CALL ME IF YOU HAVE ANY QUESTIONS.

BEST REGARDS,

JORGE A. GONZALEZ

TOTAL PAGES SENT: 03

BRIDGESTONE FIRESTONE VENEZOLANA C.A.
RIF: J-00014878-0

Carretera Nacional Valencia - Los Guayos
Apdo. 194 - Valencia 2003 - A
E-Mail: prensa@telcel.net.ve
Telef: (041)407.811 - 407.788
Fax: (041) 38.58.77 - 32.18.51 - 33.87.73
Valencia, Edo. Carabobo
Venezuela

PRIVILEGED & CONFIDENTIAL
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JAG201-05/00
Valencia, May 04, 2000

Mr. E. Cassingena
President
Ford Motor de Venezuela
Valencia

Dear Mr. Cassingena:

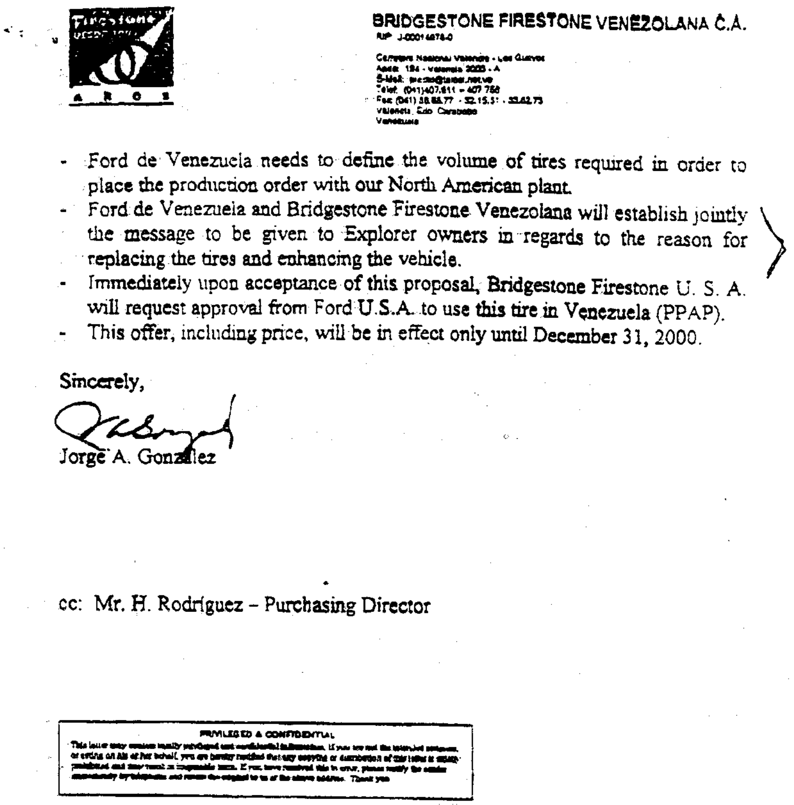
Subject: Special Program – Ford Explorer

Bridgestone Firestone has agreed to the program stated below, which addresses several issues concerning tire application in Venezuela, particularly in relation to the Explorer SUV. This program can be started within a reasonable time provided that the tires will be fitted on any vehicle on which the suspension has been modified and we reach agreement on the price and logistics considerations.

Our North American plants will do everything possible to pull ahead production of the 255-70R16 U152 Special Export Service Tire for transfer to Venezuela. The offer is contingent upon the acceptance of the issues mentioned below:

- Proposed sales price for fitment on new vehicles and application in the enhancement program will be: US$46.21 which is based on a tire price of US$39.50 plus US$6.71 customs expenses.
- Upon start of the program, all new Ford Explorers requiring this size tire will be fitted with the new tire.
- Bridgestone Firestone Venezolana will absorb the freight expense to Venezuela and the tire mounting and balancing on vehicles included in the enhancement program. This service will be provided by the Bridgestone Firestone Venezolana dealer network.
- The new tires will be provided as a component of the package offered by Ford dealers, which includes the modification of the suspension in the pre-2000 models.

755



BRIDGESTONE FIRESTONE VENEZOLANA C.A.
RIF J-00014478-0

Carretera Nacional Valencia - Los Guayos
Apdo. 194 - Valencia 2003 - A
E-Mail: [illegible]
Telef. (041)407.611 - 407 758
Fax (041) 38.88.77 - 32.15.31 - 33.42.73
Valencia, Edo. Carabobo
Venezuela

- Ford de Venezuela needs to define the volume of tires required in order to place the production order with our North American plant.
- Ford de Venezuela and Bridgestone Firestone Venezolana will establish jointly the message to be given to Explorer owners in regards to the reason for replacing the tires and enhancing the vehicle.
- Immediately upon acceptance of this proposal, Bridgestone Firestone U. S. A. will request approval from Ford U.S.A. to use this tire in Venezuela (PPAP).
- This offer, including price, will be in effect only until December 31, 2000.

Sincerely,

Jorge A. Gonzalez

cc: Mr. H. Rodriguez – Purchasing Director

PRIVILEGED & CONFIDENTIAL

moval Codes

BFTE Home Page BFTE Depts

ire Testing Up

REVISED 01/28/00

REMOVAL CODE DESCRIPTIONS

(CLICK TO JUMP TO SPECIFIED REMOVAL CAUSE)

TECHNICIAN CODES - BEAD AREA - BODY - SIDEWALL - TREAD AREA - INNERLINER
RETREAD / REPAIR - MISCELLANEOUS - OTHER - SHOULDER

REMOVAL	ABBREVIATION	CODE
Technician Codes		
Removed No Failure - Completed Test	RNF	901
Separation in Tread Area	TSEP	902
Separation in Side Wall	SSEP	903
Crack or Chunk Out in Sidewall	SWC	904
Bead Area - Within 1" of Flange	BD	905
Equipment or Machine Failure	EQP	906
Airloss - Any	AIR	907
Tread Throw Off or Chunk Out	TTO	908
Unidentified	UND	909

Injury	WO	911
Worn Out	OTHER	912
Other		
Bead Area		
Bead Chafe	BDCH	A01
Bead Tie in	BDTI	A03
Bead - Other	BD	A05
Reinf Sep	RENSEP	A07
Chafer Sep	CHFSEP	A09
Bead Flow Crack	BDFC	A11
Bead Bundle Sep	BDBUNDLSEP	A13
Body Sep at the Top of the Flange	BSTF	A14
	FRCBDFLLR	A15
Fractured Bead Filler	AGSSEP	A16
Abrasion Gum Strip Separation	BDBUNDLBRK	A17 (DISCONTINUED AS OF 1/28/00)
Bead Bundle Break		
Body		
Flex - Any	FB	B01 (DISCONTINUED AS OF 1/28/00)
Flex to Ply Sep	FBPS	B03
Flex to Turn Up Ply Sep	FBTUPS	B05
Sep - Other	SEP	B07
Turn Up Ply Sep	TUPSEP	B09
X Break	XB	B11
Diag Break	DB	B13
Ply Sep	PS	

Rapid Air Loss	RAL	
Lower Sidewall Body Break	LSBB	B17
Impact Break	IMP BRK	B18
Sidewall Flex Break	SWFB	B19
Upper Sidewall Body Break	USBB	B20
Air Loss	AL	B21
Spread Cords	SPRDCRDS	B22
Run Low Loose Cords	RLOLSCORDS	B23
Strained Cords	STRAINCORD	B24 (DISCONTINUED AS OF 1/28/00)
Crack in Body Ply	CRKINBP	B25
TUP Sep of TR3 Ending-Outer (TUP Ends Under Tread)	TR3SEPOUT TR3SEPIN	B26 (DISCONTINUED AS OF 1/28/00)
TUP Sep of TR3 Ending-Inner (Buried TUP End)	BPSEPBLTED	B27 (DISCONTINUED AS OF 1/28/00)
Body Ply Sep at Belt Edge		B28 (DISCONTINUED AS OF 1/28/00)
		B29 (DISCONTINUED AS OF 1/28/00)
Sidewall		
Sidewall Flow Crack	SWFC	C01
Circum Crack	CIRCRK	C05
Circum Bar Crack	CIRBAR	C07
Radial Crack	RC	C09
Sidewall Sep	SWSEP	C11
Sidewall Injury	SWINJ	C13 (DISCONTINUED AS OF 1/28/00)
Sidewall Cut	SWCUT	
Diagonal Crack	DIAG CRK	C15 (DISCONTINUED AS OF 1/28/00)

Open Sidewall Splice	OSS	ⓒ C17
Tread Edge Crack	TEC	C19
Sidewall Sep at Body Ply Splice	SWSEPBPSPL	C21
Sidewall Sep at Innerliner Splice	SWSEPILSPL	C22
Weather Checking	WC	C23
Upper Sidewall Separation	UPPERSWSEP	C25
Lower Sidewall Separation	LOWERSWSEP	C26
Diagonal Crack Open Sidewall Splice	DIAG-OSS	C27
Body Cord Socketing	BPS	C28
White Sidewall Tear at Rim Centering Rib	WSWTRCR	C29
Star Crack Upper Sidewall	STARCRK	C30 (DISCONTINUED AS OF 1/28/00) C31
Tread Area		
Tread Crack	TC	D01
Tread Cut	TCUT	D09
Tread Ply Sep	TPS	D15
Stabilizer Ply Sep Over	SPSO	D17
Stabilizer Ply Sep Under	SPSU	D19
Tread Sep - Other	TS	D21
Cap Base Sep	TSCAP	D23
Tread Chunk Out	TCO	D25
Open Tread Splice	OTS	D29
Tread Wear - Cupping	CUP	D31

Stock Blow	STKBLO	D37
Crown Break	CB	D39
Stabilizer Ply Break	SPBRK	D45
Sep Edge of Trd Ply	SETP	D47 (DISCONTINUED AS OF 1/28/00)
Tread Tearing	TRD TRG	D49
Tread Chipping	TRD CHPG	D51
Tread Sep Off Cord	TSOC	D53
Cut Growth	CG	D55
Tread Sep Over Undertread	TSO	D58
Tread Sep Under Undertread	TSU	D59
Belt Edge Insert Tear	BEI TEAR	D60
Belt Edge Insert Rubber Reversion	BEIRUBREV	D61
Sep Edge Of Stabilizer Ply #1	SESP #1	D62
Sep Edge Of Stabilizer Ply #2	SESP #2	D63
Sep Edge Of Stabilizer Ply #1 Belt Edge Insert Split	SESPIBEISP	D64
Belt Edge Insert Tear To and Along Body	BEITEARBOD	D65
Tread Distort	TRDDISTORT	D66
Tread Throw Off	TRDTHROFF	D67
Sep Edge Stabilizer Ply	SESP	D68
Stabilizer Ply Sep Under	SPSU	D69
Groove Flex Checking	GRFLXCHK	D70
Decoupling Groove Cracking	DGC	D71
	TSS/THROFF	D72
	TSS/CO	

Tread Shoulder Sep/ Throw-Off (>180°)

Tread Shoulder Sep/ Chunkout (<180°)

Shoulder Tear

Stone Drilling

Locked Brakes

Irregular Wear

Step-Wipe

Tread Tuber Delamination

Cap Ply/Undertread Separation

Tread/Cap Sep at Cap Ply Splice

Sep Between #1 and #2 SP

Sep Top of #2 SP

Sep Below #1 SP

Sep From Edge of #1 Thru BEI

Sep Between BEI & Body Toward Crown

Sep Between BEI & Body Toward SW or Bead

Sep Above #1 SP Between Edge of #1 & #2 SP

"V" Sep Around Edge of #2 SP

"V" Sep Around Edge of #1 SP

SHDTEAR

STNDRILL

LOCBRAKES

IRREGWEAR

STEP-WIPE

TTDELAM

CAPUTSEP

TCSEPCPSPL

SEP A

SEP AA

SEP B

SEP C

SEP D

SEP F

SEP H

SEP VA

SEP VB

SEP VAB

SEP SA

SEP SB

D73

D74

D75

D76

D77

D78

D79

D80

D81

D82 (DISCONTINUED AS OF 1/28/00)

D83 (DISCONTINUED AS OF 1/28/00)

D84 (DISCONTINUED AS OF 1/28/00)

D85 (DISCONTINUED AS OF 1/28/00)

D86 (DISCONTINUED AS OF 1/28/00)

D87 (DISCONTINUED AS OF 1/28/00)

D88 (DISCONTINUED AS OF 1/28/00)

D89 (DISCONTINUED AS OF 1/28/00)

D90 (DISCONTINUED AS OF 1/28/00)

D91 (DISCONTINUED AS OF 1/28/00)

"V" Sep Around Edges of #1 & #2 SP		D92 (DISCONTINUED AS OF 1/28/00)
Socketing of Steel Cord or Fabric of Top Belt		D93 (DISCONTINUED AS OF 1/28/00)
Socketing of Steel Cord or Fabric of Bottom Belt		
Innerliner - Band Ply Innerliner - Band Ply		
Open Innerliner Splice	OILS	E01
Lofted Cords	LTCORD	E07
Innerliner Cracking	ILCRK	E09
Band Ply Sep	BPS	E11
Innerliner Separation	ILSEP	E13
Innerliner Splice Separation	ILSPLSEP	E14
Innerliner Circumferential Crack	ILCIRCRK	E15
Innerliner Splice Crack	ILSPLCRK	E16
Retread - Repair		
Retread Sep Off Buff	RTSO	F01
Retread Sep Under Buff	RTSU	F03
Repair - Any	REP	F05 (DISCONTINUED AS OF 1/28/00)
Repair - Patch	PATCH	F07
Repair - Plug	PLUG	F08
Retread Edge Lifting	RTEL	F09
Miscellaneous		
Factory Defect	FDEF	G01
Foreign Material	FMAT	G03
Delamination	DELAM	G05

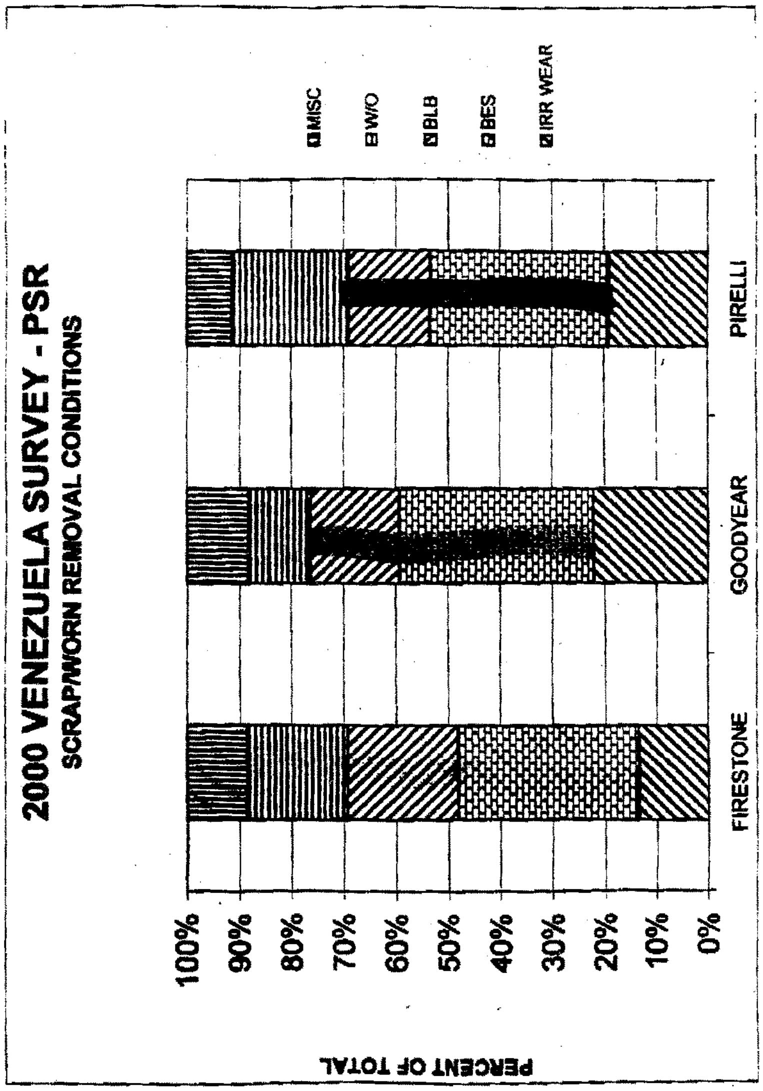
Injury	INJ	G09
Run Flat	RFLAT	G12
Lost Tire	LOST	G17
Run Low Flex	RLOF	G18
Degradation of Body Plies	DOBP	G19
Eccentric Wear	ECCWR	G20
Equipment Failure	EQUIPF	G21
Wheel Failure	WHEELF	G22
Misalignment	MALIGN	G23
No Test	NOTEST	G25 (DISCONTINUED AS OF 1/28/00)
Tube Failure	TUBEFAIL	G27
Puncture Run Flat - Tread	TRD PUNTRF	G28
Puncture Run Flat - SW Ser	SER PUNTRF	G29
Puncture Run Flat - SW Opp	OPP PUNTRF	G30
Puncture - Tread	TRD PUNCT	G31
Puncture - SW Ser	SER PUNCT	G32
Puncture - SW Opp	OPP PUNCT	G33
Puncture Repair Failure - Tread	TRD PUNREF	G34
Puncture Repair Failure - SW Ser	SER PUNREF	G35
Puncture Repair Failure - SW Opp	OPP PUNREF	G36
Flap Failure	FLAPFAIL	G37
Sep Due Puncture	SEPDUEPUNC	G38
	LOSTNOTFND	G39 (DISCONTINUED AS OF
	MISMATCH	

Lost - Not Found		
Tires Mismatched	MISMTD	G40
Tires Mismounted	SELNT	G41
Sealant		G42
Other		
Worn Out	WO	H01
Worn To Fabric/ Steel	WTF	H03
Removed No Failure	RNF	H05
Anomaly	ANOMALY	H06
Cancelled	CANCELLED	H09
Held Tire	HELD	H10 (DISCONTINUED AS OF 1/28/00)
Shoulder		
Circumferential Shoulder Cracking	CIRSHLDCRK	I01
Shoulder Cut Growth	SHLDCUTGR	I02
Cure Fold Shoulder	CUREFOLDSH	I03
Shoulder Distort	SHLDDIST	I04
Shoulder Sep	SHDSEP	I05
Shoulder Slot Crack	SHDSLOTCRK	I06
Shoulder Break	SHDBRK	I07 (DISCONTINUED AS OF 1/28/00)

EXPLANANTION OF DATA ON RECORD OF INDOOR TEST RESULTS

TEST NO.	Identification number of individual test
TST COD	Test code. This code identifies the particuliar test. Detailed information about the test procedure can be obtained from the corresponding test protocol sheet.
SIZE	Tire size
DOT SERIAL	Generally, if this number includes EXP,EXC,OEP,the tire is an experimental tire that is not in production at the time of the test. If there is no DOT number the tire may not have had a DOT number.
SPEC NO	Regular production tires usually have 6 digits. If the entry has 2 letters, 3 numbers and another letter, e.g., SL531J, it is probably an experimental tire. However, if an experimental tire makes it through all the necessary testing and becomes a production tire, it may retain the same spec number. One may be able to confirm that a tire is experimental at the time of the test by referring to the previous column. EXP, for example, means tire is experimental.
DSH	Dash number.This is the number the individual tire received as part of the group of tires that were made/acquired for the test. An insignificant number except for inventory purposes.
DURA	Duration. If the length of time is relevant, such as in a high speed test, there is a number in this column that reflects the length of time the tire ran at the step of the

	test that it failed. E.g., tire failed at 0.2 minutes in the 110 speed phase.
REM SPD	Removal speed, mph. If speed is the same in all tests, it means all tests were run at that speed.
MILES/BURST PSI	If the test run is a test that accumulates miles run, this will show miles run. (The test results produced here show miles run.) If it's a burst test, it will show burst pressure.
REM 1	Removal cause number one. This number corresponds to the technician code numbers on the Removal Code Descriptions sheet.
REM 1 DESCR	Abbreviated description of the failure cause.
REM 2	Removal cause 2. Not often used.
REM3	Removal cause 3. Not often used.
CONF	Confirmed. Confirms failure description made by technician who removed tire from test.
FINAL STEP HRS/MIN	A more precise recording of the duration: actual minutes or hours in the final step of the test. (Used for tests with increasing speed increments)
REMOV LOAD	Load on tire at the last stage of the test (when test stopped).
DATE COMPLETED	Test completion date.


2000 VENEZUELA SURVEY - PSR
SCRAP/WORN REMOVAL CONDITIONS
PERCENT OF TOTAL
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
FIRESTONE
GOODYEAR
PIRELLI
MISC
W/O
BLB
BES
IRR WEAR

BRIDGESTONE / Firestone
Original Equipment Tire Sales Company
One Towne Square, Suite 1470
Southfield, MI 48076-3705

December 6, 1999

DRAFT

Ms. Denise Baker
World Wide Purchasing
NAO Headquarters
30400 Mound Rd 1-8
PO Box 9015
Warren, MI 48090-9015

Subject: NHTSA Investigation Update

As you know NHTSA has had a preliminary evaluation on three of our tire lines. Radial ATX, ATXII and Wilderness. General Motors purchases two sizes in the Wilderness line that we have supplied beginning in August of 1998. Our adjustment data, which we have reviewed with your engineering community along with the fact that these tires have passed all the durability and wear testing that GM requires, is a testimony to the excellent performance our mutual customers are receiving in the market place.

I have attached the latest media releases by BFS. These highlight the key issues:

- Special interest group (Strategic Safety Group), who's clients are personal injury law firms have pushed for a recall without having first hand knowledge.
- Adjustment data provided to NHTSA are extremely low. We have produced 48 million tires with billions of safe miles driven.
- Tires must be cared for as outlined in our warranty manuals that are placed in every GM vehicle and are referred to in your owners manual as well. Inflation pressure is an area that continually is not maintained as we all would expect by the motoring public.
- We encourage any concerned customers with these products to go to one their local Firestone retailers for a free inspection. We will assure the vehicle manufacturers tire pressure is placed in the tires and will continue our policy of customer satisfaction.

NHTSA's preliminary evaluation is in its very early stages. Based upon what we know today there is no data to suggest that GM vehicle owners will have durability issues with the tires on GM vehicles.

BRIDGESTONE / Firestone
Original Equipment Tire Sales Company
One Towne Square, Suite 1470
Southfield, MI 48076-3705

Very truly yours,

Michael E. Martini
Global Team Leader
O.E. Sales

cc: Art Stuart / P Hoda / Dale Ray

Wilderness ATX letter to GM

CONFIDENTIAL

BRIDGESTONE / FIRESTONE INC.

C1.6

TO: **R. MARTIN**
FROM: V. GREGORY-KOCAJ
DATE: September 7, 1999

RE: WILDERNESS AT: P235/75R15 & P255/70R16

ADJUSTED TO DATE FROM DAY ONE. MOST [illegible] 1995 to de[illegible] OTC 1998

The following tables are the adjustment data you requested.

SEPARATION RETURNS BY PLANT:

SIZE	GROUP	DESC	DECATUR	JOLIETTE	OKLAHOMA CITY	WILSON
P235/75R15	01	SEPARATIONS	98	68	0	94
			0.003%	0.007%	0.000%	0.004%
P255/70R16	01	SEPARATIONS	2	102		41
			0.001%	0.008%		0.003%

SEPARATION RETURNS BY REGION:

SIZE	AREA	GROUP	DESC	COUNT
P235/75R15	MIDWEST	01	SEPARATIONS	8
P235/75R15	N EAST	01	SEPARATIONS	121
P235/75R15	N WEST	01	SEPARATIONS	11
P235/75R15	NORTH	01	SEPARATIONS	47
P235/75R15	S.CENTRAL	01	SEPARATIONS	23
P235/75R15	S EAST	01	SEPARATIONS	23
P235/75R15	S WEST	01	SEPARATIONS	27
				260
P255/70R16	MIDWEST	01	SEPARATIONS	14
P255/70R16	N EAST	01	SEPARATIONS	47
P255/70R16	N WEST	01	SEPARATIONS	1
P255/70R16	NORTH	01	SEPARATIONS	42
P255/70R16	S.CENTRAL	01	SEPARATIONS	21
P255/70R16	S.EAST	01	SEPARATIONS	7
P255/70R16	S WEST	01	SEPARATIONS	13
				145

BRIDGESTONE/FIRESTONE, INC.

TO Mr. R. O. Martin

FROM B.V. Halverson

DATE March 11, 1999

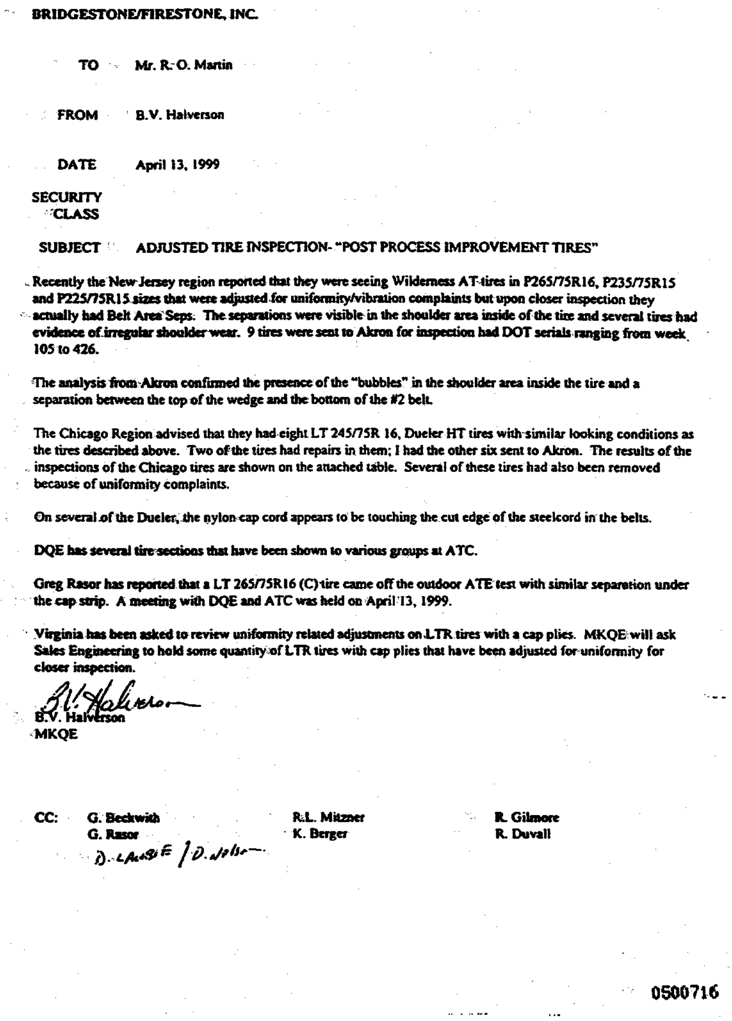
SECURITY CLASS

SUBJECT "POST PROCESS IMPROVEMENT"ADJUSTED TIRE INSPECTION

Several months ago the New Jersey region reported that they were receiving P235/75R16 Wilderness AT tires that **were adjusted for uniformity/vibrations complaints that had** Belt Area Seps as evidenced in the shoulder area inside **of the tire. There were no external indications of separations.** Tires were sent to Akron for inspection.

The Chicago Region advised that they had eight LT 245/75R 16, Dueler HT tires with similar looking conditions **as the tires described above. Two of the tires had repairs in them, I had the other six sent to Akron. In addition to the Chicago tires there were other Post Improvement tires that had been sent from the Dallas area several weeks** EARLIER **~~ago~~. The results of the inspections are shown below:**

DOT Serial	RTR #	Belt Area	Other comments
7BA3PDB038	CH99 001	BSW- sep under cap strip WSW- sep on top and bottom of wedge	Wedge appears to be reverted Lower sw ozone cracking
7B.....038	CH99 001	BSW Small sep at top and bottom of #2 Stab Ply WSW Small sep at top and bottom of #1 Stab ply Sep between top of wedge and cap strip	Wedge appears to be reverted Lower sw ozone cracking
7B.....038	CH99 001	Sep at edge #2 belt, to edge of #1 belt and under #1 belt. Sep on bottom of wedge	Wedge appears to be revertyed Lower sw ozone cracking
7B.....038	CH99 001	Sep at edge of #2 belt to edge of # 1 belt	Wedge appears to be reverted Lower sw ozone cracking
7B.....147	CH99 002	BSW sep starts at edge of # 1 belt and extends UP toward #2 belt WSW sep at edge of #2 belt and extendns down to #1 belt under the wedge	Wedge appears to be reverted Lower sw ozone cracking
7B.....147	CH99 002	BSW sep starts at edge of #1 belt and extends UP toward #2 belt WSW sep top and bottom of #2 belt goes down to aedge of #1 belt	Wedge appears to be reverted Lower sw ozone cracking



BRIDGESTONE/FIRESTONE, INC.

TO Mr. R. O. Martin

FROM B.V. Halverson

DATE April 13, 1999

SECURITY CLASS

SUBJECT ADJUSTED TIRE INSPECTION- "POST PROCESS IMPROVEMENT TIRES"

Recently the New Jersey region reported that they were seeing Wilderness AT tires in P265/75R16, P235/75R15 and P225/75R15 sizes that were adjusted for uniformity/vibration complaints but upon closer inspection they actually had Belt Area Seps. The separations were visible in the shoulder area inside of the tire and several tires had evidence of irregular shoulder wear. 9 tires were sent to Akron for inspection had DOT serials ranging from week 105 to 426.

The analysis from Akron confirmed the presence of the "bubbles" in the shoulder area inside the tire and a separation between the top of the wedge and the bottom of the #2 belt.

The Chicago Region advised that they had eight LT 245/75R 16, Dueler HT tires with similar looking conditions as the tires described above. Two of the tires had repairs in them; I had the other six sent to Akron. The results of the inspections of the Chicago tires are shown on the attached table. Several of these tires had also been removed because of uniformity complaints.

On several of the Dueler, the nylon cap cord appears to be touching the cut edge of the steelcord in the belts.

DQE has several tire sections that have been shown to various groups at ATC.

Greg Rasor has reported that a LT 265/75R16 (C) tire came off the outdoor ATE test with similar separation under the cap strip. A meeting with DQE and ATC was held on April 13, 1999.

Virginia has been asked to review uniformity related adjustments on LTR tires with a cap plies. MKQE will ask Sales Engineering to hold some quantity of LTR tires with cap plies that have been adjusted for uniformity for closer inspection.

B.V. Halverson

B.V. Halverson
MKQE

CC: G. Beckwith
G. Rasor
D. LACASSE / D. Nelson
R.L. Mitzner
K. Berger
R. Gilmore
R. Duvall

LTR Belt Edge Sepa Claim

(Returns by Production '91-'94 vs '95-'96)

Through 8/15/'96

		LT205/75R15		LT215/75R15		LT225/75R16		LT235/75R15		LT245/75R16		LT265/75R16		LT 85's	
Dueler HT	LV														
	Dec				0 7,102	1 955	0 6,128		0 31,523	0 548	1 11,892	0 762	4 30,370	0 1,548	0 6,173
Dueler AT	LV							13 98,731	1 42,517						
	Dec								7 39,030		0 12,251	0 24	29 25,674		
Fhwk RMT	Dec									1 3,205	1 1,338	1 3,841	0 8,407	10 5,272	16 7,682
Fhwk ATX	Jol			3 22,351	0 6,409										
	Dec							26 63,591	10 131,882			2 22,712	3 32,203	4 5,813	1 4,579
Radial ATX	Jol														
	Dec			9 24,105				19 50,207	3 13,135					6 6,801	
Fhwk R4S	Jol	0 16,398	0 4,127	0 1,774	1 1,738			32 41,720	0 113						
	Dec			6 25,260	0 7,430			30 54,954	7 56,690			6 16,061	1 7,679	1 4,632	0 579
Total	LV	0 0	0 0	0 0	0 0	0 0	0 0	13 98,731	1 42,517	0 0	0 0	0 0	0 0	0 0	0 0
	Jol	0 16,398	0 4,127	3 24,125	1 8,147	0 0	0 0	32 41,720	0 113	0 0	0 0	0 0	0 0	0 0	0 0
	Dec	0 0	0 0	15 49,365	0 14,532	1 955	0 6,128	74 168,752	27 272,260	1 3,753	2 25,481	9 43,400	37 104,333	21 24,066	17 19,013

Historically more return,
but 27 in 1~1.5 years
looks bad.

Recent Problem.
29 in 1-1.5 years
with AT is really bad.

Historically more return.
(Rather recent problem?)

LTR Adjustment Analysis
8/96 9/96 Survey

Adjustments By Tire Type

			100	136	139	145	234	235	599	702	750	Grand Total	
			Trd			Belt	SP Edge	SP Edge	Interior	Uniform	No W/M		
	TIRE TYPE		Punct	BLB	TLB	Distort	Sep - Cut	Sep - No Cut	Misc	OOR	found	Grand Total	
	BS D HT	Avg % Wear		40				20				37	Avg % Wear
		# of tires		6				1				7	# of tires
	BS Dueler AT	Avg % Wear		26		20	20	32			23	28	Avg % Wear
		# of tires		12		2	1	28			6	49	# of tires
	Day Stg AT	Avg % Wear		20								20	Avg % Wear
		# of tires		3								3	# of tires
	Dytn Stg Rib	Avg % Wear		30								30	Avg % Wear
		# of tires		2								2	# of tires
	FHWK ATX	Avg % Wear	20	30				46			35	36	Avg % Wear
		# of tires	1	6				7			12	26	# of tires
	FHWK R4S	Avg % Wear		60				60		60	20	40	Avg % Wear
		# of tires		4				1		1	4	10	# of tires
	FHWK RMT	Avg % Wear						34			47	38	Avg % Wear
		# of tires						7			3	10	# of tires
	RADIAL ATX	Avg % Wear						40	60			50	Avg % Wear
		# of tires						1	1			2	# of tires
	STLX R4S	Avg % Wear						40				40	Avg % Wear
		# of tires						1				1	# of tires
	TRANS TRAC	Avg % Wear	60	48				40			20	45	Avg % Wear
		# of tires	1	5				1			1	8	# of tires
	Triph Terr AT	Avg % Wear			20							20	Avg % Wear
		# of tires			1							1	# of tires
	WDTK BJ AT	Avg % Wear		40				30				33	Avg % Wear
		# of tires		1				2				3	# of tires
	Total Average of % Worn		40	34	20	20	20	35	60	60	31	34	
	Total Count of Tire #		2	39	1	2	1	49	1	1	26	122	

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Done for Duran/Rasm for shown Tests

B1.7

LTR TIRES PRODUCED AND ADJUSTED 1/97 THROUGH 11/99
BELT SEPARATION RETURNS

GROUP	ARTICLE	NAME	SIZE	PLY	RETURNS	PROD	TOTAL	TRD LEAVING CASING	BLT LEAVING BLT	BRK LEAV CASING	CAS LEAV CAS	TRD LEAV BELT	BELT DIST	BES
01	286699	DUELER A/T	32X11.50R15LT	6	1	14	7.1429		7.1429					
01	291692	R273 SWP	LT245/75R16	10	203	38195	0.5315	0.0026	0.2121	0.0026	0.0026	0.0052	0.0105	0.2959
01	291730	R273 SWP	9.50R16.5LT	10	19	3904	0.4867		0.1793			0.0512		0.2561
01	289620	DUELER H/T	LT265/75R16	6	355	93238	0.3807	0.0021	0.0493	0.0011		0.0054	0.0011	0.3218
01	238066	DAYRSTAGHWY	LT235/85R16	10	65	23658	0.2747	0.0042	0.1353				0.0169	0.1184
01	286648	DUELER A/T	LT265/75R16	6	139	58301	0.2384	0.0069	0.0652	0.0017	0.0017	0.0017	0.0172	0.1441
01	282936	FIREHWK ATX	33X12.50R15LT	6	3	1402	0.2140							0.2140
01	280860	STLTEXRDR4S	LT225/75R16	6	3	1412	0.2125		0.0708					0.1416
01	278947	DAY R STGXT	30X9.50R15LT	6	18	8970	0.2007		0.1115					0.0892
01	282995	FIREHWK ATX	LT255/85R16	8	3	1586	0.1892					0.0631	0.1261	
01	272116	DAYRSTAGHWY	9.50R16.5LT	8	4	2241	0.1785		0.0446					0.1339
01	222224	RADIAL ATX	30X9.50R15LT	6	2	1271	0.1574							0.1574
01	294128	DAY STAG LT	30X9.50R15LT	6	24	15873	0.1512	0.0063	0.0441					0.1008
01	281638	DAY STAG AT	30X9.50R15LT	6	37	25155	0.1471	0.0080	0.0596			0.0159		0.0636
01	291277	R273 SWP	LT235/85R16	8	3	2223	0.1350		0.0900					0.0450
01	290750	DUELER A/T	LT245/75R16	6	45	33480	0.1344		0.0239			0.0030	0.0269	0.0806
01	238058	DAYRSTAGHWY	LT215/85R16	8	21	15997	0.1313	0.0063	0.0938					0.0313
01	279439	DAY R STGXT	LT265/75R16	6	25	19774	0.1264	0.0152	0.0657				0.0051	0.0405
01	292338	M773 SWP	LT245/75R16	10	71	59984	0.1184	0.0050	0.0150		0.0017	0.0067	0.0083	0.0817
01	293776	R273 SWP	LT235/75R15	6	14	12706	0.1102		0.0236					0.0866
01	291285	R273 SWP	LT235/85R16	10	77	71758	0.1073	0.0084	0.0404			0.0028	0.0028	0.0530
01	282952	FIREHWK ATX	33X12.50R16.5LT	8	3	2926	0.1025	0.0342				0.0342		0.0342
01	290629	DUELER H/T	LT245/75R16	6	66	66049	0.0999		0.0091			0.0030		0.0878
01	282944	FIREHWK ATX	31X10.50R16.5LT	8	2	2039	0.0981		0.0490					0.0490
01	291749	R273 SWP	LT215/85R16	10	44	48597	0.0905		0.0370			0.0021	0.0021	0.0494
01	238031	DAYRSTAGHWY	7.50R16LT	8	4	4423	0.0904	0.0226	0.0678					
01	291706	R273 SWP	LT225/75R16	8	20	24601	0.0813	0.0041	0.0285			0.0041	0.0041	0.0406
01	278491	DAY R STGXT	LT235/85R16	10	33	42753	0.0772	0.0070	0.0398					0.0304
01	285048	DAY STAG AT	LT265/75R16	6	34	44277	0.0768	0.0023	0.0339					0.0407
01	281654	DAY STAG AT	32X11.50R15LT	6	8	10805	0.0740		0.0185					0.0555
01	279404	DAY R STGXT	LT215/85R16	8	6	8180	0.0733	0.0122	0.0367					0.0244
01	286508	STLTEX A/T	9.50R16.5LT	10	6	8216	0.0730		0.0122					0.0609
01	294322	DA STAG A/S	LT235/85R16	10	20	28981	0.0690	0.0035	0.0104			0.0035	0.0035	0.0483
01	253472	RADIAL ATX	LT215/75R15	6	1	1461	0.0684		0.0684					
01	272108	DAYRSTAGHWY	8.75R16.5LT	8	1	1495	0.0669	0.0669						

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                          --- IFICATION---            **ACTIVE**    PAGE  1   273520
                    DECATUR,      JOLIETTE  ONLY
P235/75R15 FIRESTONE WILDERNESS AT                          271849  (JOL)

ADD THE FOLLOWING TO CURED PAGE COMMENTS:  BW1   .49

CHANGE:                  FROM:       TO:
  POST INFLATE RIM       5.50"       5.00"
----------------------------------------------------------------------------
P235/75R15 FIRESTONE WILDERNESS AT                           269556  (JOL)

ADD THE FOLLOWING TO CURED PAGE COMMENTS:  BW1   .49

CHANGE:                  FROM:       TO:
  POST INFLATE RIM       ---         5.00"
----------------------------------------------------------------------------
P235/75R15 FIRESTONE WILDERNESS AT                            271048  (DEC)
"          "         "          "                             271258   "


ADD THE FOLLOWING TO CURED PAGE COMMENTS:  BW1   .49.

REASON:  DETAIL CORRECTIONS.




 J. C. BOND
 B. J. QUEISER
                ISSUED 04/30/97                  PRINT  04/30/97 RLSD  4/30/97 273520
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SPEC UPDATES

P235/75R15 WILDERNESS AT 2 + 2/8 P1255AD1A1 RWOL 1:1        #270197
    "          "       "  "          "       "   M2         #271235

 ADD THE FOLLOWING TO CURES (270197 ONLY):
  POST INFLATE ON 5.00" RIM

 ADD THE FOLLOWING NOTE TO CURED TIRE PAGE COMMENTS:
  NOTE:  BW1 = .49



REASON:  ENGINEERING DESIGN CRITERIA.

                 Q.A. TEST REQUIREMENTS:
PREV/QUAL=Y,N   PILOT  X-R  A-R  PC  NA  X-RAY  RRFM  UTQG    SECT-AN    SPEED-RATED   IPS/ISIR
    NO                                X



 R. P. MUELLER
 B. J. QUEISER
                ISSUED 05/29/97                       PRINT  05/30/97 RLSD  5/29/97 273571
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                                  SPECIFICATION          **ACTIVE**    PAGE  1   273520
                       DECATUR,     JOLIETTE  ONLY
P235/75R15 FIRESTONE WILDERNESS AT                         271849  (JOL)

ADD THE FOLLOWING TO CURED PAGE COMMENTS:   BW1    .49

CHANGE:                    FROM:        TO:
  POST INFLATE RIM         5.50"        5.00"
-------------------------------------------------------------------------------
P235/75R15 FIRESTONE WILDERNESS AT                          269556  (JOL)

ADD THE FOLLOWING TO CURED PAGE COMMENTS:   BW1    .49

CHANGE:                    FROM:        TO:
  POST INFLATE RIM         ---          5.00"
-------------------------------------------------------------------------------
P235/75R15 FIRESTONE WILDERNESS AT                           271048  (DEC)
"          "         "          "                            271258   "


ADD THE FOLLOWING TO CURED PAGE COMMENTS:   BW1    .49

REASON:  DETAIL CORRECTIONS.



 J. C. BOND
 B. J. QUEISER
                ISSUED 04/30/97                   PRINT  04/30/97 RLSD  4/30/97 273520
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SPEC UPDATES

P235/75R15 WILDERNESS AT 2 + 2/S P1255AD1A1 RWOL 1:1       #270197
    "          "       "   "        "       "   M2         #271235

 ADD THE FOLLOWING TO CURES (270197 ONLY):
  POST INFLATE ON 5.00" RIM

 ADD THE FOLLOWING NOTE TO CURED TIRE PAGE COMMENTS:
  NOTE:  BW1 = .49



REASON:  ENGINEERING DESIGN CRITERIA.

              Q.A. TEST REQUIREMENTS:
PREV/QUAL=Y,N   PILOT  X-R  A-R  PC  NA  X-RAY  RRFM  UTQG    SECT-AN    SPEED-RATED   IPS/ISIR
    NO                                X



 R. P. MUELLER
 B. J. QUEISER
             ISSUED 05/29/97                            PRINT  05/30/97 RLSD  5/29/97 273571
```

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                                  SPECIFICATION           **ACTIVE**    PAGE   1   273520
                        DECATUR,    JOLIETTE  ONLY
P235/75R15 FIRESTONE WILDERNESS AT                         271849  (JOL)

ADD THE FOLLOWING TO CURED PAGE COMMENTS:   BW1   .49

CHANGE:                 FROM:          TO:
  POST INFLATE RIM      5.50"          5.00"
----------------------------------------------------------------------------------
P235/75R15 FIRESTONE WILDERNESS AT                          269556   (JOL)

ADD THE FOLLOWING TO CURED PAGE COMMENTS:   BW1   .49

CHANGE:                 FROM:          TO:
  POST INFLATE RIM      ---            5.00"
----------------------------------------------------------------------------------
P235/75R15 FIRESTONE WILDERNESS AT                          271048  (DEC)
"          "         "          "                           271258   "


ADD THE FOLLOWING TO CURED PAGE COMMENTS:   BW1   .49.

REASON:  DETAIL CORRECTIONS.



 J. C. BOND
 B. J. QUEISER
               ISSUED 04/30/97                        PRINT  04/30/97 RLSD  4/30/97 273520
```

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SPEC UPDATES

P235/75R15 WILDERNESS AT 2 + 2/8 P1255AD1A1 RWOL 1:1        #270197
    "           "        "   "          "        "    M2         #271235

 ADD THE FOLLOWING TO CURES (270197 ONLY):
  POST INFLATE ON 5.00" RIM

 ADD THE FOLLOWING NOTE TO CURED TIRE PAGE COMMENTS:
  NOTE:  BW1 = .49


REASON:  ENGINEERING DESIGN CRITERIA.

               Q.A. TEST REQUIREMENTS:
PREV/QUAL=Y,N   PILOT  X-R  A-R  PC  NA  X-RAY  RRFM  UTQG    SECT-AN    SPEED-RATED   IPS/ISIR
    NO                                X



 R. P. MUELLER
 B. J. QUEISER
                ISSUED 05/29/97                            PRINT  05/30/97 RLSD  5/29/97 273571
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BRIDGESTONE/FIRESTONE TIRE SALES COMPANY INTEROFFICE MEMO

TO: M. Hamaya
DATE: January 15, 1997
FROM: K. Ball
REF. NO: KB-97-03
SUBJECT: **1996 Minor P/L Year-End Analysis**

Enclosed is the 1996 Minor PL Activity Summary for BFTS.

If you have any questions or comments, please advise.

Sincerely,

Ken W. Ball
Senior Manager
Sales Engineering

KWB/dg

cc: Hal Horton
Gary Garfield (Return to Sales Engineering)
Dave Laubie

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LT CLAIMS BY PATTERN

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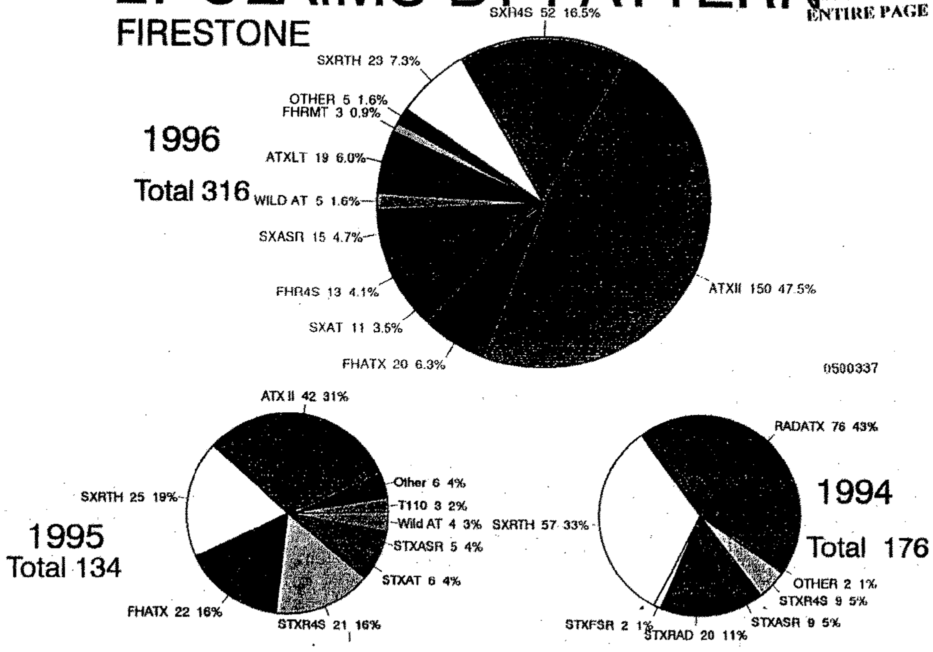

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1996 FS LT CLAIMS BY PATTERN BY DOT PLANT CODE

Pattern	HY	VD	VL	VM	VN	W1	W2	?	Total
ATX II	3	31	0	1	36	0	78	1	150
SXR4S		37			12	2		1	52
SXRTH		22	1						23
FH ATX	0	20	0	0	0	0	0	0	20
ATX LT	0	17	0	0	1	0	1	0	19
SX ASR		13			2				15
FH R4S		13							13
SX AT		1			9			1	11
WILD AT							5		5
FH RMT		3							3
MISC.	1	3					1		5
TOTAL	**4**	**160**	**1**	**1**	**60**	**2**	**85**	**3**	**316**

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ENTIRE PAGE

1996 FS LT CLAIMS BY PATTERN BY DAMAGE TYPE

Pattern	SEP	R/H	Other	Total
ATX II	105	18	27	150
SXR4S	17	29	6	52
SXRTH	9	7	7	23
FHATX	14	5	1	20
ATXLT	11	2	6	19
SXASR	3	8	4	15
FH R4S	3	6	4	13
SX AT	7	3	1	11
WILD AT	0	5	0	5
FHRMT	1	1	1	3
MISC.	4	1	0	5
TOTAL	**174**	**85**	**57**	**316**

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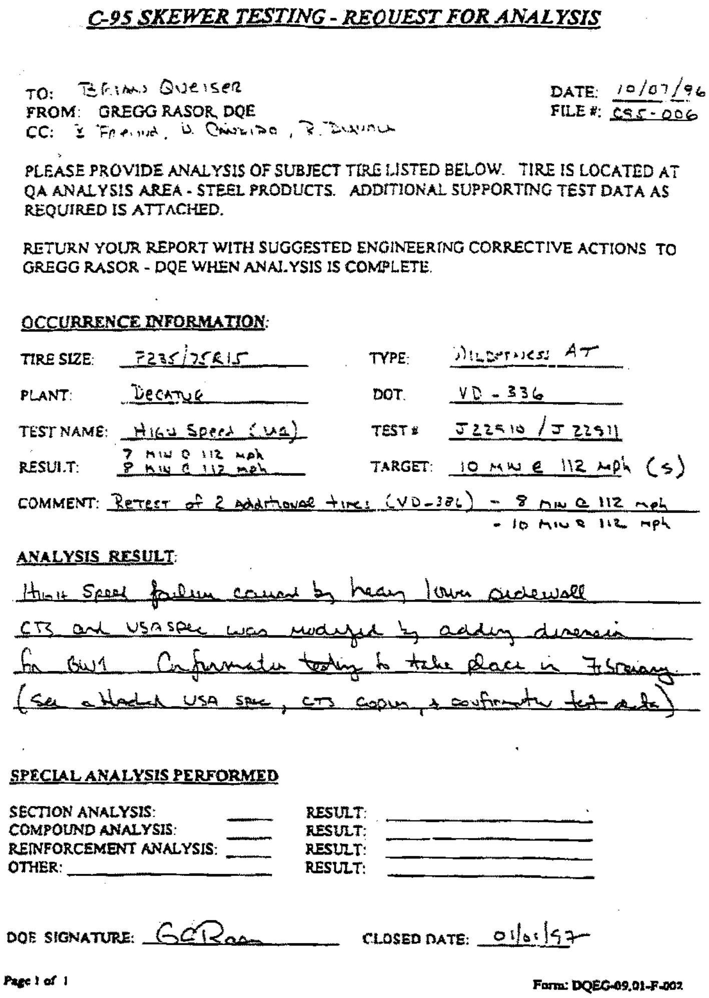
ENTIRE PAGI

FS LT BY DOT MFG YEAR

CLAIM YEAR DOT YEAR	1996		1995		1994	
	N	%	N	%	N	%
0	12	4	16	12	19	12
1	31	10	16	12	20	13
2	74	24	31	24	22	14
3	67	21	15	12	9	6
4	54	17	17	13	15	10
5	37	12	13	10	16	10
6	19	6	13	10	24	15
7	5	2	1	1	10	6
8	4	1	4	3	9	6
9	9	3	3	2	11	7
?	3		5		21	
TOTAL	315	100	134	100	176	100



C-95 SKEWER TESTING - REQUEST FOR ANALYSIS

TO: Brian Queiser
FROM: GREGG RASOR, DQE
CC: E Freund, D. [illegible], R. [illegible]

DATE: 10/07/96
FILE #: C95-006

PLEASE PROVIDE ANALYSIS OF SUBJECT TIRE LISTED BELOW. TIRE IS LOCATED AT QA ANALYSIS AREA - STEEL PRODUCTS. ADDITIONAL SUPPORTING TEST DATA AS REQUIRED IS ATTACHED.

RETURN YOUR REPORT WITH SUGGESTED ENGINEERING CORRECTIVE ACTIONS TO GREGG RASOR - DQE WHEN ANALYSIS IS COMPLETE.

OCCURRENCE INFORMATION:

TIRE SIZE:	P235/75R15	TYPE:	Wilderness AT
PLANT:	Decatur	DOT:	VD - 336
TEST NAME:	High Speed (US)	TEST #:	J22910 / J22911
RESULT:	7 min @ 112 mph 8 min @ 112 mph	TARGET:	10 min @ 112 mph (s)

COMMENT: Retest of 2 additional tires (VD-386) - 8 min @ 112 mph
- 10 min @ 112 mph

ANALYSIS RESULT:

High Speed failure caused by heavy lower sidewall
CTS and USA spec was modified by adding dimension
for GW1 Confirmation testing to take place in February.
(See attached USA spec, CTS copies, & confirmation test data)

SPECIAL ANALYSIS PERFORMED

SECTION ANALYSIS: ____ RESULT: ____
COMPOUND ANALYSIS: ____ RESULT: ____
REINFORCEMENT ANALYSIS: ____ RESULT: ____
OTHER: ____ RESULT: ____

DQE SIGNATURE: GCRasor CLOSED DATE: 01/06/97

Page 1 of 1

Form: DQEG-09.01-F-002

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LT CLAIMS BY PATTERN

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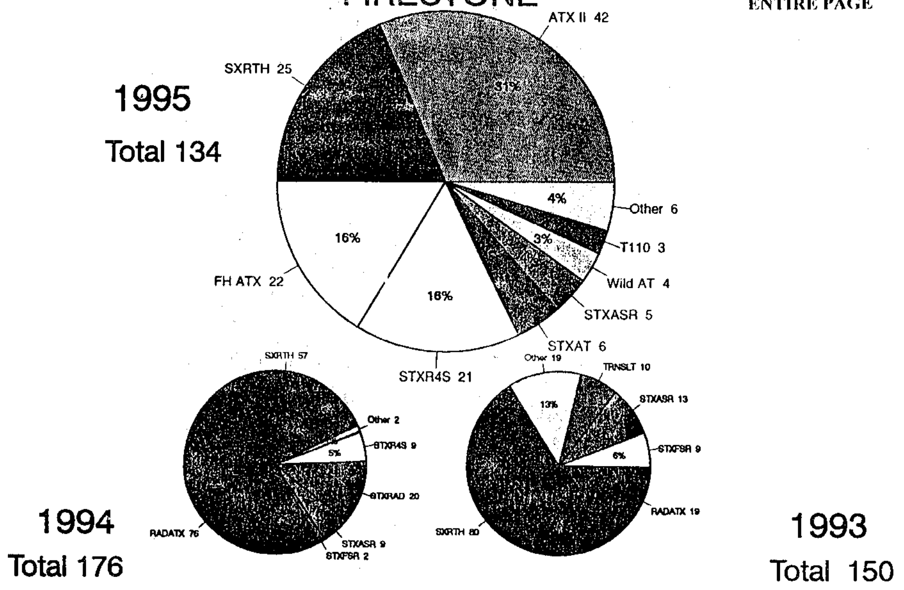

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ENTIRE PAGE

1995 FS LT CLAIMS BY PATTERN BY DAMAGE TYPE

Pattern	R/H	SEP	Other	Total
ATX II	5	34	3	42
SXRTH	2	19	4	25
FH ATX	3	18	1	22
SX R4S	14	6	1	21
SX AT	4	1	1	6
SXASR	1	4		5
WILD AT	2		2	4
T110	1	2		3
ATX	1			1
ATX 23		1		1
FH R4S		1		1
SX RAD	1			1
SX FSR		1		1
TRANS		1		1
TOTAL	**34**	**88**	**12**	**134**

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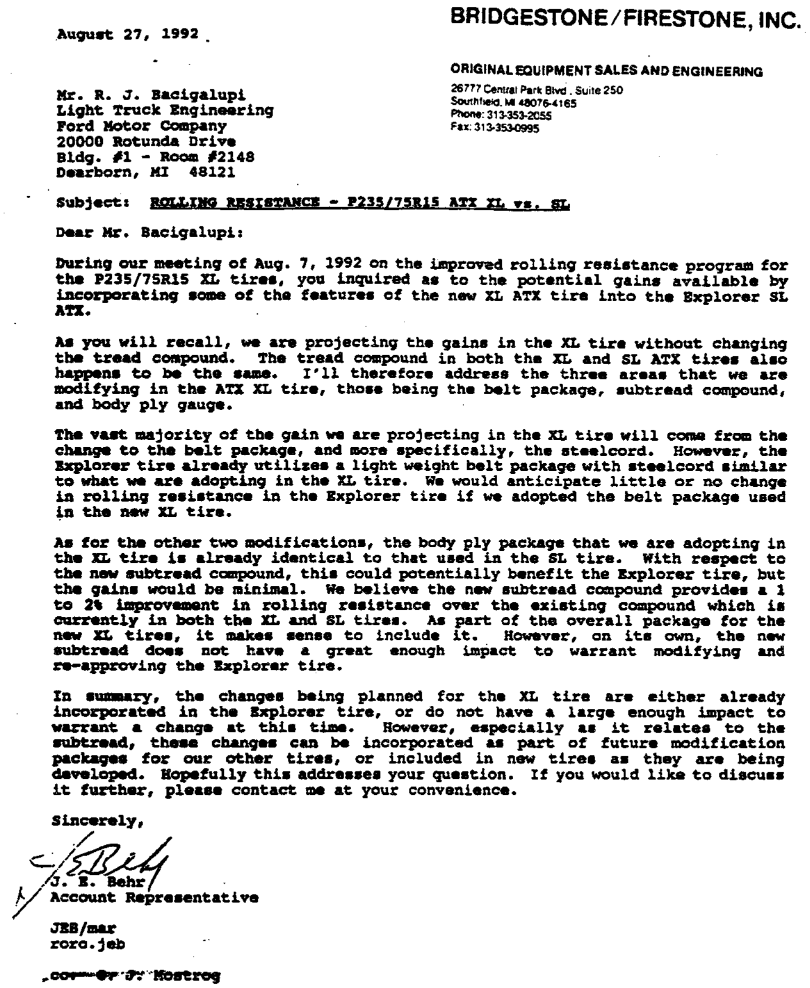
ENTIRE PAGE

1995 FS LT CLAIMS BY PATTERN BY DOT PLANT CODE

Pattern	HY	VC	VD	VE	VL	VN	VP	V5	W2	YD	?	Total
ATX II		1	11			14			14		2	42
SX RTH			21		1		1?				2	25
FH ATX			22									22
SX R4S			18			3						21
SX AT			1			4				1		6
SX ASR			4		1							5
WILD AT						2					2	4
T 110			1	1				1				3
ATX						1						1
ATX 23			1									1
FHR4S			1									1
SX RAD			1									1
SX FSR			1									1
TRANS	1											1
TOTAL	1	1	82	1	2	24	1	1	14	1	6	134



BRIDGESTONE/FIRESTONE, INC.

ORIGINAL EQUIPMENT SALES AND ENGINEERING
26777 Central Park Blvd. Suite 250
Southfield, MI 48076-4165
Phone: 313-353-2055
Fax: 313-353-0995

August 27, 1992

Mr. R. J. Bacigalupi
Light Truck Engineering
Ford Motor Company
20000 Rotunda Drive
Bldg. #1 - Room #2148
Dearborn, MI 48121

Subject: ROLLING RESISTANCE - P235/75R15 ATX XL vs. SL

Dear Mr. Bacigalupi:

During our meeting of Aug. 7, 1992 on the improved rolling resistance program for the P235/75R15 XL tires, you inquired as to the potential gains available by incorporating some of the features of the new XL ATX tire into the Explorer SL ATX.

As you will recall, we are projecting the gains in the XL tire without changing the tread compound. The tread compound in both the XL and SL ATX tires also happens to be the same. I'll therefore address the three areas that we are modifying in the ATX XL tire, those being the belt package, subtread compound, and body ply gauge.

The vast majority of the gain we are projecting in the XL tire will come from the change to the belt package, and more specifically, the steelcord. However, the Explorer tire already utilizes a light weight belt package with steelcord similar to what we are adopting in the XL tire. We would anticipate little or no change in rolling resistance in the Explorer tire if we adopted the belt package used in the new XL tire.

As for the other two modifications, the body ply package that we are adopting in the XL tire is already identical to that used in the SL tire. With respect to the new subtread compound, this could potentially benefit the Explorer tire, but the gains would be minimal. We believe the new subtread compound provides a 1 to 2% improvement in rolling resistance over the existing compound which is currently in both the XL and SL tires. As part of the overall package for the new XL tires, it makes sense to include it. However, on its own, the new subtread does not have a great enough impact to warrant modifying and re-approving the Explorer tire.

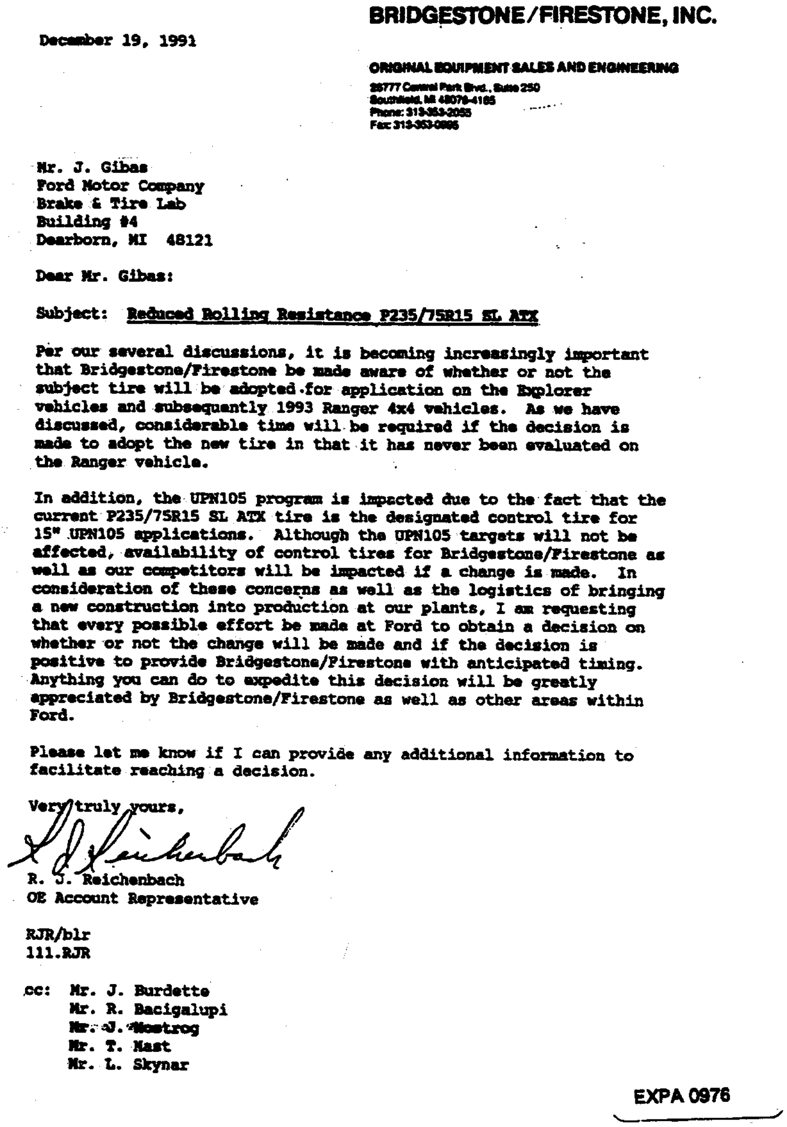
In summary, the changes being planned for the XL tire are either already incorporated in the Explorer tire, or do not have a large enough impact to warrant a change at this time. However, especially as it relates to the subtread, these changes can be incorporated as part of future modification packages for our other tires, or included in new tires as they are being developed. Hopefully this addresses your question. If you would like to discuss it further, please contact me at your convenience.

Sincerely,

J. E. Behr
Account Representative

JEB/mar
roro.jeb

~~cc: Dr. J. Kostrog~~



BRIDGESTONE/FIRESTONE, INC.

ORIGINAL EQUIPMENT SALES AND ENGINEERING
25777 Central Park Blvd., Suite 250
Southfield, MI 48076-4165
Phone: 313-353-2055
Fax: 313-353-0986

December 19, 1991

Mr. J. Gibas
Ford Motor Company
Brake & Tire Lab
Building #4
Dearborn, MI 48121

Dear Mr. Gibas:

Subject: Reduced Rolling Resistance P235/75R15 SL ATX

Per our several discussions, it is becoming increasingly important that Bridgestone/Firestone be made aware of whether or not the subject tire will be adopted for application on the Explorer vehicles and subsequently 1993 Ranger 4x4 vehicles. As we have discussed, considerable time will be required if the decision is made to adopt the new tire in that it has never been evaluated on the Ranger vehicle.

In addition, the UPN105 program is impacted due to the fact that the current P235/75R15 SL ATX tire is the designated control tire for 15" UPN105 applications. Although the UPN105 targets will not be affected, availability of control tires for Bridgestone/Firestone as well as our competitors will be impacted if a change is made. In consideration of these concerns as well as the logistics of bringing a new construction into production at our plants, I am requesting that every possible effort be made at Ford to obtain a decision on whether or not the change will be made and if the decision is positive to provide Bridgestone/Firestone with anticipated timing. Anything you can do to expedite this decision will be greatly appreciated by Bridgestone/Firestone as well as other areas within Ford.

Please let me know if I can provide any additional information to facilitate reaching a decision.

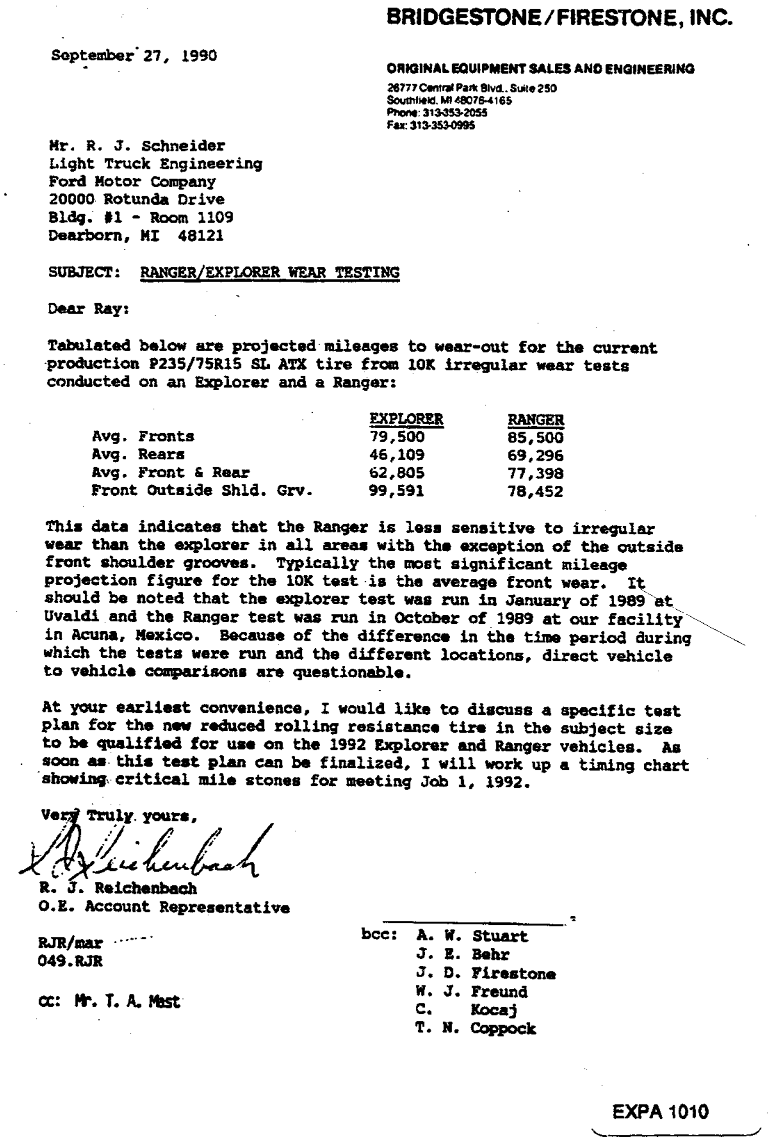
Very truly yours,

R J Reichenbach

R. J. Reichenbach
OE Account Representative

RJR/blr
111.RJR

cc: Mr. J. Burdette
Mr. R. Bacigalupi
Mr. J. Mostrog
Mr. T. Mast
Mr. L. Skynar



BRIDGESTONE/FIRESTONE, INC.

ORIGINAL EQUIPMENT SALES AND ENGINEERING

26777 Central Park Blvd., Suite 250
Southfield, MI 48076-4165
Phone: 313-353-2055
Fax: 313-353-0995

September 27, 1990

Mr. R. J. Schneider
Light Truck Engineering
Ford Motor Company
20000 Rotunda Drive
Bldg. #1 - Room 1109
Dearborn, MI 48121

SUBJECT: RANGER/EXPLORER WEAR TESTING

Dear Ray:

Tabulated below are projected mileages to wear-out for the current production P235/75R15 SL ATX tire from 10K irregular wear tests conducted on an Explorer and a Ranger:

	EXPLORER	RANGER
Avg. Fronts	79,500	85,500
Avg. Rears	46,109	69,296
Avg. Front & Rear	62,805	77,398
Front Outside Shld. Grv.	99,591	78,452

This data indicates that the Ranger is less sensitive to irregular wear than the explorer in all areas with the exception of the outside front shoulder grooves. Typically the most significant mileage projection figure for the 10K test is the average front wear. It should be noted that the explorer test was run in January of 1989 at Uvaldi and the Ranger test was run in October of 1989 at our facility in Acuna, Mexico. Because of the difference in the time period during which the tests were run and the different locations, direct vehicle to vehicle comparisons are questionable.

At your earliest convenience, I would like to discuss a specific test plan for the new reduced rolling resistance tire in the subject size to be qualified for use on the 1992 Explorer and Ranger vehicles. As soon as this test plan can be finalized, I will work up a timing chart showing critical mile stones for meeting Job 1, 1992.

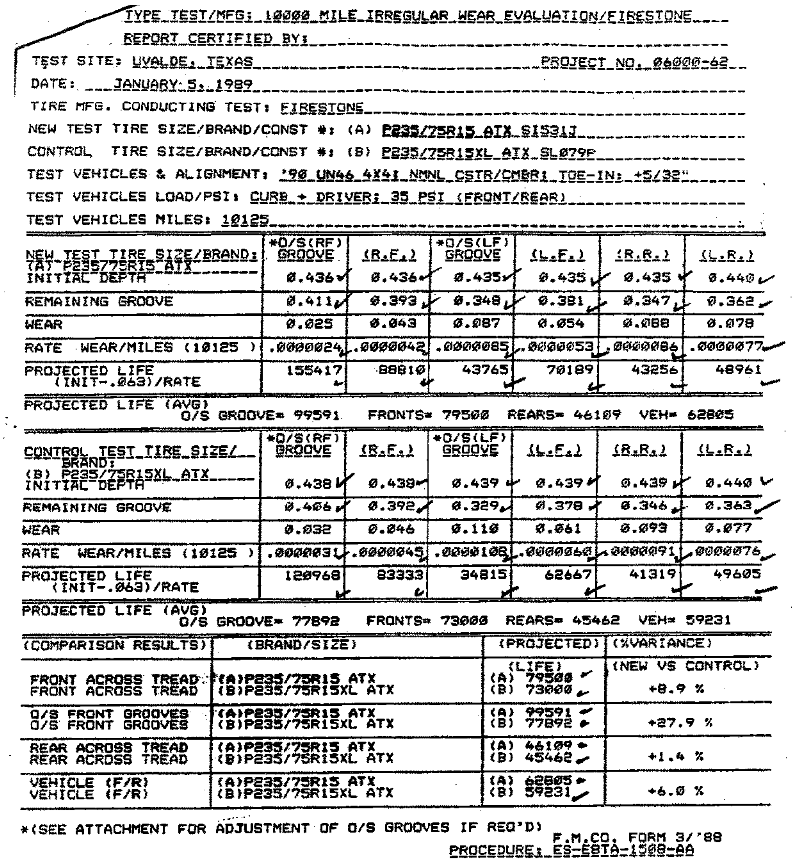
Very Truly yours,

R. J. Reichenbach
O.E. Account Representative

RJR/mar
049.RJR

cc: Mr. T. A. Mast

bcc:
A. W. Stuart
J. E. Behr
J. D. Firestone
W. J. Freund
C. Kocaj
T. N. Coppock



TYPE TEST/MFG: 10000 MILE IRREGULAR WEAR EVALUATION/FIRESTONE
REPORT CERTIFIED BY:
TEST SITE: UVALDE, TEXAS PROJECT NO. 06000-62
DATE: JANUARY 5, 1989
TIRE MFG. CONDUCTING TEST: FIRESTONE
NEW TEST TIRE SIZE/BRAND/CONST #: (A) P235/75R15 ATX SIS31J
CONTROL TIRE SIZE/BRAND/CONST #: (B) P235/75R15XL ATX SL079F
TEST VEHICLES & ALIGNMENT: '90 UN46 4X4: NMNL CSTR/CMBR: TOE-IN: +5/32"
TEST VEHICLES LOAD/PSI: CURB + DRIVER: 35 PSI (FRONT/REAR)
TEST VEHICLES MILES: 10125

NEW TEST TIRE SIZE/BRAND: (A) P235/75R15 ATX	*O/S(RF) GROOVE	(R.F.)	*O/S(LF) GROOVE	(L.F.)	(R.R.)	(L.R.)
INITIAL DEPTH	0.436	0.436	0.435	0.435	0.435	0.440
REMAINING GROOVE	0.411	0.393	0.348	0.381	0.347	0.362
WEAR	0.025	0.043	0.087	0.054	0.088	0.078
RATE WEAR/MILES (10125)	.0000024	.0000042	.0000085	.0000053	.0000086	.0000077
PROJECTED LIFE (INIT-.063)/RATE	155417	88810	43765	70189	43256	48961

PROJECTED LIFE (AVG)
O/S GROOVE= 99591 FRONTS= 79500 REARS= 46109 VEH= 62805

CONTROL TEST TIRE SIZE/ BRAND: (B) P235/75R15XL ATX	*O/S(RF) GROOVE	(R.F.)	*O/S(LF) GROOVE	(L.F.)	(R.R.)	(L.R.)
INITIAL DEPTH	0.438	0.438	0.439	0.439	0.439	0.440
REMAINING GROOVE	0.406	0.392	0.329	0.378	0.346	0.363
WEAR	0.032	0.046	0.110	0.061	0.093	0.077
RATE WEAR/MILES (10125)	.0000031	.0000045	.0000108	.0000060	.0000091	.0000076
PROJECTED LIFE (INIT-.063)/RATE	120968	83333	34815	62667	41319	49605

PROJECTED LIFE (AVG)
O/S GROOVE= 77892 FRONTS= 73000 REARS= 45462 VEH= 59231

(COMPARISON RESULTS)	(BRAND/SIZE)	(PROJECTED) (LIFE)	(%VARIANCE) (NEW VS CONTROL)
FRONT ACROSS TREAD FRONT ACROSS TREAD	(A)P235/75R15 ATX (B)P235/75R15XL ATX	(A) 79500 (B) 73000	+8.9 %
O/S FRONT GROOVES O/S FRONT GROOVES	(A)P235/75R15 ATX (B)P235/75R15XL ATX	(A) 99591 (B) 77892	+27.9 %
REAR ACROSS TREAD REAR ACROSS TREAD	(A)P235/75R15 ATX (B)P235/75R15XL ATX	(A) 46109 (B) 45462	+1.4 %
VEHICLE (F/R) VEHICLE (F/R)	(A)P235/75R15 ATX (B)P235/75R15XL ATX	(A) 62805 (B) 59231	+6.0 %

*(SEE ATTACHMENT FOR ADJUSTMENT OF O/S GROOVES IF REQ'D)
F.M.CO. FORM 3/'88
PROCEDURE: ES-EBTA-1508-AA

EXPA 1011

TYPE TEST/MFG: 10K IRREGULAR WEAR/FIRESTONE

REPORT CERTIFIED BY:

TEST SITE: ACUNA, MEXICO PROJECT NO. 21005-96

DATE: OCTOBER 3, 1989

TIRE MFG. CONDUCTING TEST: FIRESTONE

NEW TEST TIRE SIZE/BRAND/CONST #: (A) P235/75R15 ATX SL537J

CONTROL TIRE SIZE/BRAND/CONST #: (B) P215/75R15 ATX SI842J

TEST VEHICLES & ALIGNMENT: 88 RANGER 4X4: NML CASTER/CAMBER, MAX TOE-IN: +5/3

TEST VEHICLES LOAD/PSI: CURB+DRIVER, 35 PSI (F)

TEST VEHICLES MILES: 10000

NEW TEST TIRE SIZE/BRAND: (A) P235/75R15 ATX	*O/S(RF) GROOVE	(R.F.)	*O/S(LF) GROOVE	(L.F.)	(R.R.)	(L.R.)
INITIAL DEPTH	0.439	0.443	0.439	0.443	0.444	0.444
REMAINING GROOVE	0.403	0.403	0.362	0.393	0.388	0.390
WEAR	0.036	0.040	0.077	0.050	0.056	0.054
RATE WEAR/MILES (10000)	.0000035	.0000040	.0000076	.0000050	.0000056	.0000054
PROJECTED LIFE (INIT-.063)/RATE	107429	95000	49474	76000	68036	70556

PROJECTED LIFE (AVG) O/S GROOVE= 78452 FRONTS= 85500 REARS= 69296 VEH= 77398

CONTROL TEST TIRE SIZE/ BRAND: (B) P215/75R15 ATX	*O/S(RF) GROOVE	(R.F.)	*O/S(LF) GROOVE	(L.F.)	(R.R.)	(L.R.)
INITIAL DEPTH	0.402	0.409	0.403	0.409	0.409	0.409
REMAINING GROOVE	0.314	0.350	0.279	0.344	0.351	0.349
WEAR	0.088	0.059	0.124	0.065	0.058	0.060
RATE WEAR/MILES (10000)	.0000087	.0000059	.0000124	.0000065	.0000058	.0000060
PROJECTED LIFE (INIT-.063)/RATE	38966	58644	27419	53231	59655	57667

PROJECTED LIFE (AVG) O/S GROOVE= 33193 FRONTS= 55938 REARS= 58661 VEH= 57300

(COMPARISON RESULTS)	(BRAND/SIZE)	(PROJECTED) (LIFE)	(%VARIANCE) (NEW VS CONTROL)
FRONT ACROSS TREAD FRONT ACROSS TREAD	(A)P235/75R15 ATX (B)P215/75R15 ATX	(A) 85500 (B) 55938	+52.8%
O/S FRONT GROOVES O/S FRONT GROOVES	(A)P235/75R15 ATX (B)P215/75R15 ATX	(A) 78452 (B) 33193	+ 136%
REAR ACROSS TREAD REAR ACROSS TREAD	(A)P235/75R15 ATX (B)P215/75R15 ATX	(A) 69296 (B) 58661	+18.1%
VEHICLE (F/R) VEHICLE (F/R)	(A)P235/75R15 ATX (B)P215/75R15 ATX	(A) 77398 (B) 57300	+35.1%

*(SEE ATTACHMENT FOR ADJUSTMENT OF O/S GROOVES IF REQ'D)

F.M.CO. FORM 3/'88

PROCEDURE: ES-E8TA-1508-AA

TYPE TEST/MFG: [redacted] EDGE WEAR EVALUATION/FIRESTONE

REPORT CERTIFIED BY:

TEST SITE: ACUNA, MEXICO PROJECT NO. 21007-12

DATE: FEBRUARY 19, 1990

TIRE MFG. CONDUCTING TEST: FIRESTONE

NEW TEST TIRE SIZE/BRAND/CONST #: (A) [redacted] /

CONTROL TIRE SIZE/BRAND/CONST #: (B) P215/75R15 RAD ATX SI842J

TEST VEHICLES & ALIGNMENT: RANGER 4X4, NMNL CSTR/CMBR,MAX TOE-IN: +5/32"

TEST VEHICLES LOAD/PSI: CURB PLUS DRIVER, 35 PSI (FRONT AND

TEST VEHICLES MILES: 4800

NEW TEST TIRE SIZE/BRAND: (A) P215/75R15 RAD ATX	*O/S(RF) GROOVE	(R.F.)	*O/S(LF) GROOVE	(L.F.)	(R.R.)	(L.R.)
INITIAL DEPTH	0.402	0.410	0.404	0.411	0.411	0.410
REMAINING GROOVE	0.322	0.369	0.252	0.352	0.369	0.372
WEAR	0.080	0.041	0.152	0.059	0.042	0.038
RATE WEAR/MILES (4800)	.0000166	.0000085	.0000316	.0000122	.0000087	.0000079
PROJECTED LIFE (INIT-.063)/RATE	20422	40824	10791	28525	40000	43924

PROJECTED LIFE (AVG)
O/S GROOVE= 15607 FRONTS= 34675 REARS= 41962 VEH= 38319

CONTROL TEST TIRE SIZE/ BRAND: (B) P215/75R15 RAD ATX	*O/S(RF) GROOVE	(R.F.)	*O/S(LF) GROOVE	(L.F.)	(R.R.)	(L.R.)
INITIAL DEPTH	0.401	0.404	0.394	0.402	0.402	0.401
REMAINING GROOVE	0.305	0.359	0.258	0.343	0.361	0.365
WEAR	0.096	0.045	0.136	0.059	0.041	0.036
RATE WEAR/MILES (4800)	.0000200	.0000093	.0000283	.0000122	.0000085	.0000075
PROJECTED LIFE (INIT-.063)/RATE	16900	36667	11696	27787	39882	45067

PROJECTED LIFE (AVG)
O/S GROOVE= 14298 FRONTS= 32227 REARS= 42475 VEH= 37351

(COMPARISON RESULTS)	(BRAND/SIZE)	(PROJECTED) (LIFE)	(%VARIANCE) (NEW VS CONTROL)
FRONT ACROSS TREAD FRONT ACROSS TREAD	(A)P215/75R15 RAD ATX (B)P215/75R15 RAD ATX	(A) 34675 (B) 32227	[redacted]
O/S FRONT GROOVES O/S FRONT GROOVES	(A)P215/75R15 RAD ATX (B)P215/75R15 RAD ATX	(A) 15607 (B) 14298	[redacted]
REAR ACROSS TREAD REAR ACROSS TREAD	(A)P215/75R15 RAD ATX (B)P215/75R15 RAD ATX	(A) 41962 (B) 42475	[redacted]
VEHICLE (F/R) VEHICLE (F/R)	(A)P215/75R15 RAD ATX (B)P215/75R15 RAD ATX	(A) 38319 (B) 37351	[redacted]

*(SEE ATTACHMENT FOR ADJUSTMENT OF O/S GROOVES IF REQ'D)

F.M.CO. FORM 3/'88
PROCEDURE: ES-E8TA-1508-AA

TYPE TEST/MFG: [redacted] EDGE WEAR EVALUATION/FIRESTONE

REPORT CERTIFIED BY:

TEST SITE: ACUNA, MEXICO PROJECT NO. 21006-35

DATE: JANUARY 19, 1990

TIRE MFG. CONDUCTING TEST: FIRESTONE

NEW TEST TIRE SIZE/BRAND/CONST #: ([redacted]

CONTROL TIRE SIZE/BRAND/CONST #: (B) P215/75R15 FR480 SI170J

TEST VEHICLES & ALIGNMENT: RANGER 4X4; NMNL CSTR/CMBR, MAX TOE-IN:+5/32"

TEST VEHICLES LOAD/PSI: CURB+DRIVER, 35 PSI (FR)

TEST VEHICLES MILES: 4800

NEW TEST TIRE SIZE/BRAND: (A) P215/75R15 FR480	*O/S(RF) GROOVE	(R.F.)	*O/S(LF) GROOVE	(L.F.)	(R.R.)	(L.R.)
INITIAL DEPTH	0.352	0.360	0.354	0.360	0.359	0.359
REMAINING GROOVE	0.294	0.316	0.264	0.308	0.313	0.328
WEAR	0.058	0.044	0.090	0.052	0.046	0.031
RATE WEAR/MILES (4800)	.0000120	.0000091	.0000187	.0000108	.0000095	.0000064
PROJECTED LIFE (INIT-.063)/RATE	24083	32637	15561	27500	31158	46250

PROJECTED LIFE (AVG)
O/S GROOVE= 19822 FRONTS= 30069 REARS= 38704 VEH= 34387

CONTROL TEST TIRE SIZE/ BRAND: (B) P215/75R15 FR480	*O/S(RF) GROOVE	(R.F.)	*O/S(LF) GROOVE	(L.F.)	(R.R.)	(L.R.)
INITIAL DEPTH	0.359	0.359	0.359	0.359	0.360	0.359
REMAINING GROOVE	0.299	0.317	0.263	0.308	0.309	0.315
WEAR	0.060	0.042	0.096	0.051	0.051	0.044
RATE WEAR/MILES (4800)	.0000125	.0000087	.0000200	.0000106	.0000106	.0000091
PROJECTED LIFE (INIT-.063)/RATE	23680	34023	14800	27925	28019	32527

PROJECTED LIFE (AVG)
O/S GROOVE= 19240 FRONTS= 30974 REARS= 30273 VEH= 30624

(COMPARISON RESULTS)	(BRAND/SIZE)	(PROJECTED) (LIFE)	(%VARIANCE) (NEW VS CONTROL)
FRONT ACROSS TREAD FRONT ACROSS TREAD	(A)P215/75R15 FR480 (B)P215/75R15 FR480	(A) 30069 (B) 30974	[redacted]
O/S FRONT GROOVES O/S FRONT GROOVES	(A)P215/75R15 FR480 (B)P215/75R15 FR480	(A) 19822 (B) 19240	[redacted]
REAR ACROSS TREAD REAR ACROSS TREAD	(A)P215/75R15 FR480 (B)P215/75R15 FR480	(A) 38704 (B) 30273	[redacted]
VEHICLE (F/R) VEHICLE (F/R)	(A)P215/75R15 FR480 (B)P215/75R15 FR480	(A) 34387 (B) 30624	[redacted]

*(SEE ATTACHMENT FOR ADJUSTMENT OF O/S GROOVES IF REQ'D)

F.M.CO. FORM 3/'88
PROCEDURE: ES-ESTA-1508-AA

TYPE TEST: ME[redacted]EDGE WEAR EVALUATION/FIRESTONE

REPORT CERTIFIED BY:

TEST SITE: ACUNA, MEXICO PROJECT NO. 21006-34

DATE: FEBRUARY 12, 1990

TIRE MFG. CONDUCTING TEST: FIRESTONE

NEW TEST TIRE SIZE/BRAND/CONST #: [redacted] 14x5½ WHEEL

CONTROL TIRE SIZE/BRAND/CONST #: (B) P215/70R14 FR480 H905JA

TEST VEHICLES & ALIGNMENT: RANGER 4X2: NMNL CSTR/CMBR, MAX TOE-IN: +5/32"

TEST VEHICLES LOAD/PSI: CURB PLUS DRIVER, 35 PSI (FRONT AND

TEST VEHICLES MILES: 4800

NEW TEST TIRE SIZE/BRAND: (A) P215/70R14 FR480	*O/S(RF) GROOVE	(R.F.)	*O/S(LF) GROOVE	(L.F.)	(R.R.)	(L.R.)
INITIAL DEPTH	0.361	0.363	0.360	0.363	0.363	0.363
REMAINING GROOVE	0.318	0.330	0.316	0.333	0.313	0.321
WEAR	0.043	0.033	0.044	0.030	0.050	0.042
RATE WEAR/MILES (4800)	.0000089	.0000068	.0000091	.0000062	.0000104	.0000087
PROJECTED LIFE (INIT-.063)/RATE	33483	44118	32637	48387	28846	34483

PROJECTED LIFE (AVG)
O/S GROOVE= 33060 FRONTS= 46253 REARS= 31665 VEH= 38959

CONTROL TEST TIRE SIZE/BRAND: (B) P215/70R14 FR480	*O/S(RF) GROOVE	(R.F.)	*O/S(LF) GROOVE	(L.F.)	(R.R.)	(L.R.)
INITIAL DEPTH	0.360	0.358	0.358	0.358	0.361	0.359
REMAINING GROOVE	0.317	0.324	0.315	0.327	0.302	0.307
WEAR	0.043	0.034	0.043	0.031	0.059	0.052
RATE WEAR/MILES (4800)	.0000089	.0000070	.0000089	.0000064	.0000122	.0000108
PROJECTED LIFE (INIT-.063)/RATE	33371	42143	33146	46094	24826	27407

PROJECTED LIFE (AVG)
O/S GROOVE= 33259 FRONTS= 44119 REARS= 25917 VEH= 35018

(COMPARISON RESULTS)	(BRAND/SIZE)	(PROJECTED) (LIFE)	(%VARIANCE) (NEW VS CONTROL)
FRONT ACROSS TREAD FRONT ACROSS TREAD	(A) P215/70R14 FR480 (B) P215/70R14 FR480	(A) 46253 (B) 44119	[redacted].4
O/S FRONT GROOVES O/S FRONT GROOVES	(A) P215/70R14 FR480 (B) P215/70R14 FR480	(A) 33060 (B) 33259	[redacted]0.6%
REAR ACROSS TREAD REAR ACROSS TREAD	(A) P215/70R14 FR480 (B) P215/70R14 FR480	(A) 31665 (B) 25917	[redacted]22.2%
VEHICLE (F/R) VEHICLE (F/R)	(A) P215/70R14 FR480 (B) P215/70R14 FR480	(A) 38959 (B) 35018	[redacted].3%

*(SEE ATTACHMENT FOR ADJUSTMENT OF O/S GROOVES IF REQ'D)

F.M.CO. FORM 3/'88
PROCEDURE: ES-E8TA-1508-AA

TYPE TEST/MFG: [redacted] EDGE WEAR EVALUATION/FIRESTONE
REPORT CERTIFIED BY:
TEST SITE: ACUNA, MEXICO PROJECT NO. 21006-71
DATE: JANUARY 15, 1990
TIRE MFG. CONDUCTING TEST: FIRESTONE
NEW TEST TIRE SIZE/BRAND/CONST #: (A) [redacted] 14X5½ WHEEL
CONTROL TIRE SIZE/BRAND/CONST #: (B) P195/70R14 FR480 SH941J
TEST VEHICLES & ALIGNMENT: RANGER 4X2, NMNL CSTR/CMBR.MAX TOE-IN: +5/32"
TEST VEHICLES LOAD/PSI: CURB + DRIVER, 35 PSI FRONT AND REA
TEST VEHICLES MILES: 4800

NEW TEST TIRE SIZE/BRAND: (A) P195/70R14 FR480	*O/S(RF) GROOVE	(R.F.)	*O/S(LF) GROOVE	(L.F.)	(R.R.)	(L.R.)
INITIAL DEPTH	0.343	0.347	0.345	0.350	0.347	0.348
REMAINING GROOVE	0.272	0.288	0.267	0.295	0.272	0.279
WEAR	0.071	0.059	0.078	0.055	0.075	0.069
RATE WEAR/MILES (4800)	.0000147	.0000122	.0000162	.0000114	.0000156	.0000143
PROJECTED LIFE (INIT-.063)/RATE	19048	23279	17407	25175	18205	19930

PROJECTED LIFE (AVG)
O/S GROOVE= 18228 FRONTS= 24227 REARS= 19068 VEH= 21648

CONTROL TEST TIRE SIZE/ BRAND: (B) P195/70R14 FR480	*O/S(RF) GROOVE	(R.F.)	*O/S(LF) GROOVE	(L.F.)	(R.R.)	(L.R.)
INITIAL DEPTH	0.342	0.348	0.348	0.350	0.348	0.347
REMAINING GROOVE	0.256	0.287	0.261	0.297	0.268	0.275
WEAR	0.086	0.061	0.087	0.053	0.080	0.072
RATE WEAR/MILES (4800)	.0000179	.0000127	.0000181	.0000110	.0000166	.0000150
PROJECTED LIFE (INIT-.063)/RATE	15587	22441	15746	26091	17169	18933

PROJECTED LIFE (AVG)
O/S GROOVE= 15667 FRONTS= 24266 REARS= 18051 VEH= 21159

(COMPARISON RESULTS)	(BRAND/SIZE)	(PROJECTED) (LIFE)	(%VARIANCE) (NEW VS CONTROL)
FRONT ACROSS TREAD FRONT ACROSS TREAD	(A)P195/70R14 FR480 (B)P195/70R14 FR480	(A) 24227 (B) 24266	[redacted]0.2%
O/S FRONT GROOVES O/S FRONT GROOVES	(A)P195/70R14 FR480 (B)P195/70R14 FR480	(A) 18228 (B) 15667	[redacted]16.3%
REAR ACROSS TREAD REAR ACROSS TREAD	(A)P195/70R14 FR480 (B)P195/70R14 FR480	(A) 19068 (B) 18051	[redacted]5.6%
VEHICLE (F/R) VEHICLE (F/R)	(A)P195/70R14 FR430 (B)P195/70R14 FR480	(A) 21648 (B) 21159	[redacted]2.3%

*(SEE ATTACHMENT FOR ADJUSTMENT OF O/S GROOVES IF REQ'D)

F.M.CO. FORM 3/'88
PROCEDURE: ES-E8TA-1508-AA

CONFIDENTIAL

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                                        INDOOR DURABILITY TESTING

                                                                                  C
                                                        MILES/                    O FINAL FINA
TEST     TST                    DOT   SPEC      DSH        REM   BURST REM REM 1   REM REM N STEP  STEP REMOV   DATE
 NO      COD SIZE               SERIA  NO       NO    DURA SPD    PSI   1  DESCR    2   3  F  HRS  MIN. LOAD.  COMPLETED
------   --- -------------- ----- -------   ---  ------- ---- ------ --- ------- --- --- - ----- ---- -----  ----------
  TEST NAME: BEAD TEST
69131     A1  P235/75R15           SL531J    18      0.0 0050  10000 A05 BD               Y   0.0    0      0 1988-12-06

  TEST NAME: DEFLECTION TEST
H6697     D1  P235/75R15           SL531J            0.0 0000      0                      Y   0.0    0      0 1990-04-25
H6698     D1  P235/75R15           SL531J            0.0 0000      0                      Y   0.0    0      0 1990-04-25
J0240     D1  P235/75R15           SL531J    A       0.0 0000      0                      Y   0.0    0      0 1990-12-05
J0241     D1  P235/75R15           SL531J    C       0.0 0000      0                      Y   0.0    0      0 1990-12-07
J0242     D1  P235/75R15           SL531J    B       0.0 0000      0                      Y   0.0    0      0 1990-12-06
J1594     D1  P235/75R15           SL531J    01      0.0 0000      0                      Y   0.0    0      0 1991-04-24
J1775     D1  P235/75R15           SL531J            0.0 0000      0                      Y   0.0    0      0 1991-05-13

  TEST NAME: DOT HIGH SPEED TEST(MVSS109)
G9127     G6  P235/75R15           SL531J    58      0.1 0105    374 D21 TS               Y   0.0    6      0 1988-11-17
G9128     G6  P235/75R15           SL531J    23      0.4 0105    405 D21 TS               Y   0.0   24      0 1988-11-17
J13568    G6  P235/75R15     W2473 SR897J    200     0.1 0115    482 C11 SWSEP                0.0    6      0 1994-04-23
J13569    G6  P235/75R15           SR897J    201     0.5 0115    470 C12 SWSEP                0.0   30      0 1994-04-23

  TEST NAME: Q.A. GENERAL DURABILITY TEST
G9129     H6  P235/75R15           SL531J    47      0.0 0050   3550 A05 BD               Y   0.0    0      0 1988-12-05
G9130     H6  P235/75R15           SL531J    22      0.0 0050   3700 A05 BD               Y   0.0    0      0 1988-12-01

  TEST NAME: BRIDGESTONE OVERALL END B PASS STANDARD LOAD TIRE
H4590     H60 P235/75R15           SL531J    24      0.0 0037   2044 B09 TUPSEP           Y   0.0    0      0 1989-12-04

  TEST NAME: BRIDGESTONE OVERALL END C PASS
H6957     H63 P235/75R15           257968    07      0.0 0037   6251 B09 TUPSEP  C05 E01 Y   0.0    0      0 1990-06-01
H6958     H63 P235/75R15           257968    08      0.0 0037   6251 B09 TUPSEP  C05 E09 Y   0.0    0      0 1990-06-01
H6959     H63 P235/75R15           257968    09      0.0 0037   6251 B09 TUPSEP  C05 E09 Y   0.0    0      0 1990-06-01
J11049    H63 P235/75R15     VN343 262555    49      0.0 0037   3124 C11 SWSEP            Y   0.0    0      0 1993-09-28
J11050    H63 P235/75R15     VN343 262555    50      0.0 0037   5820 A15 FRCBDFL          Y   0.0    0      0 1993-10-01
J11051    H63 P235/75R15     VN343 262555    51      0.0 0037   5400 A15 FRCBDFL          Y   0.0    0      0 1993-10-01
J11052    H63 P235/75R15     VN343 262555    52      0.0 0037   4736 A15 FRCBDFL          Y   0.0    0      0 1993-10-01
J19330    H63 P235/75R15     VD405 SR897J    30        - 0037   6250 H05 RNF              -     -    -      - 1995-11-09
J19331    H63 P235/75R15     VD405 SR897J    31        - 0037   6250 H05 RNF              -     -    -      - 1995-11-09
J2141     H63 P235/75R15           SL531J            0.0 0037     98 H05 RNF              Y   0.0    0      0 1992-10-13

  TEST NAME: TRUCK DOT ENDURANCE TEST
J13567    H7  P235/75R15     W2473 SR897J    203     0.0 0050   2750 H05 RNF              Y   4.0    0      0 1994-05-04

  TEST NAME: TREAD SEPARATION TEST
H4724     I4  P235/75R15           SL531J    14      0.0 0050  35095 D39 CB               Y   0.0    0      0 1990-01-12
H4725     I4  P235/75R15           SL531J    47      0.0 0050  40000 H05 RNF              Y   0.0    0      0 1990-01-18


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                                                   INDOOR DURABILITY TESTING

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                                                              MILES/                       O FINAL FINA
 TEST     TST                        DOT   SPEC    DSH            REM  BURST  REM REM 1    REM REM N STEP  STEP REMOV   DATE
  NO      COD SIZE                  SERIA  NO      NO      DURA  SPD    PSI    1  DESCR     2   3  F  HRS  MIN  LOAD  COMPLETED
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   TEST NAME: FORD DRUM DURABILITY TEST
 G9132    K3  P235/75R15                  SL531J   08        0.0 0050   3575 A05 BD                Y  0.0    0        0 1988-11-18
 G9133    K3  P235/75R15                  SL531J   17        0.0 0050   5325 A05 BD                Y  0.0    0        0 1988-11-22
 H8436    K3  P235/75R15                  SL531J   36        0.0 0050   5525 C26 UPPERSW           Y  0.0    0        0 1990-08-20
 H8437    K3  P235/75R15                  SL531J   37        0.0 0050   6500 H05 RNF               Y  0.0    0        0 1990-08-22
 H8931    K3  P235/75R15                  SL531J   01        0.0 0050   6500 H05 RNF               Y  0.0    0        0 1990-11-06
 H8932    K3  P235/75R15                  SL531J   02        0.0 0050   6500 H05 RNF               Y  0.0    0        0 1990-11-08
 H9353    K3  P235/75R15                  SL531J   53        0.0 0050   6100 C26 UPPERSW           Y  0.0    0        0 1990-10-22
 H9354    K3  P235/75R15                  SL531J   54        0.0 0050   6425 B09 TUPSEP            Y  0.0    0        0 1990-10-22
 H9620    K3  P235/75R15                  SL531J   20        0.0 0050   6500 H05 RNF               Y  0.0    0        0 1990-11-26
 H9621    K3  P235/75R15                  SL531J   21        0.0 0050   6500 H05 RNF               Y  0.0    0        0 1990-11-29
 H9761    K3  P235/75R15                  SL531J   61        0.0 0050   6500 H05 RNF               Y  0.0    0        0 1990-11-20
 H9762    K3  P235/75R15                  SL531J   62        0.0 0050   6500 H05 RNF               Y  0.0    0        0 1990-11-27
 J5914    K3  P235/75R15                  262555   14        0.0 0050   6500 H05 RNF               Y  0.0    0        0 1992-07-09
 J6533    K3  P235/75R15                  262555             0.0 0050   6900 H05 RNF               Y  0.0    0        0 1992-09-14
 J9067    K3  P235/75R15                  SL531J   67        0.0 0050   5600 D47 SETP              Y  0.0    0        0 1993-03-24

   TEST NAME: NEW SPECIAL FORD DRUM DURABILITY
 J13757   K30 P235/75R15           W2353  SR897J   25        0.0 0050   4100 H05 RNF               Y  0.0    0        0 1993-10-13
 J13258   K30 P235/75R15           W2353  SR897J   36        0.0 0050   4100 H05 RNF               Y  0.0    0        0 1993-10-13
 J8546    K30 P235/75R15                  262555             0.0 0050  17875 D47 SETP     025      Y  0.0    0        0 1993-03-02
 J8547    K30 P235/75R15                  262555             0.0 0050  17700 H05 RNF               Y  0.0    0        0 1993-03-02

   TEST NAME: BURST TEST
 J6847    N1  P235/75R15                  262555             0.0 0000    270 D88 BURST             Y  0.0    0        0 1992-09-15
 J6848    N1  P235/75R15                  262555             0.0 0000    250 D88 BURST             Y  0.0    0        0 1992-09-15

   TEST NAME: SPECIAL TEST
 J0681    P1  P235/75R15                  SL531J             0.0 0050   3000 H05 RNF               Y  0.0    0        0 1991-01-23
 J6211    P1  P235/75R15                  SL531J             0.0 0050   3200 H05 RNF               Y  0.0    0        0 1992-08-06
 J6212    P1  P235/75R15                  SL531J             0.0 0050   3200 H05 RNF               Y  0.0    0        0 1992-08-06
 J9068    P1  P235/75R15                  SL531J             0.0 0050   6910 D47 SETP              Y  0.0    0        0 1993-03-29

   TEST NAME: PASSENGER TIRE BREAK IN
 J19461   P3  P235/75R15           W2375  SR897J   3           - 0050    500 H05 RNF               -    -    -        - 1995-11-20
 J19538   P3  P235/75R15           W2375  SR897J   4           - 0050    500 H05 RNF               -    -    -        - 1995-11-20

   TEST NAME: PASSENGER SPEED TEST (FIGURE EIGHT SIMULATION)
 J2967    S72 P235/75R15                  SL531J   67        0.0 0062     12 D21 TS                Y  0.0    0        0 1992-01-23

   TEST NAME: SAE HIGH SPEED TEST-"S" SPEED RATING
 H1247    U1  P235/75R15                  SL531J   125       0.1 0124    115 D39 CD                Y  0.0    3        0 1989-04-04
 H1248    U1  P235/75R15                  SL531J   122       0.1 0118    100 D39 CD                Y  0.0    5        0 1989-04-04
 H1249    U1  P235/75R15                  SL531J   130       0.2 0118    109 D39 CD                Y  0.0   10        0 1989-04-04


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TEST NO	TST COD	SIZE	DOT SERIA	SPEC NO	DSH NO	DURA	REM SPD	MILES/ BURST PSI	REM 1	REM 1 DESCR	REM 2	REM 3	CON F	FINAL STEP HRS	FINA STEP MIN	REMOV LOAD	DATE COMPLETED
H1250	U1	P235/75R15		SL531J	88	0.1	0124	126	D39	CB			Y	0.0	8	0	1989-04-05
J11255	U1	P235/75R15	W2353	SR897J	10	0.1	0118	102	G19	DOBP	A15	C11	Y	0.0	4	0	1993-10-03
J11256	U1	P235/75R15	W2353	SR897J	12	0.1	0118	99	G19	DOBP	C11		Y	0.0	3	0	1993-10-01
J11504	U1	P235/75R15	W2353	SR897J	139	0.1	0118	104	D47	SETP	C11		Y	0.0	4	0	1993-10-25
J11506	U1	P235/75R15	W2353	SR897J	140	0.1	0118	108	G19	DOBP	C11		Y	0.0	8	0	1993-10-25
J11507	U1	P235/75R15	W2359	SR897J	98	0.1	0118	106	G19	DOBP	C11	D64	Y	0.0	6	0	1993-11-01
J15675	U1	P235/75R15	VHM44	267300	75	-	0118	114	B09	TUPSEP			Y	-	10	-	1994-12-10
J15677	U1	P235/75R15	VH444	267300	77	0.1	0118	106	B01	FB			Y	-	6	-	1994-12-15
J15678	U1	P235/75R15	VH444	267300	78	0.1	0118	104	B01	FB			Y	-	5	-	1994-12-10
J15679	U1	P235/75R15		267300		-	-	-					Y	-	-	-	1994-12-09
J15680	U1	P235/75R15		267300		-	-	-	H09	CANCELL			Y	-	-	-	1994-12-09
J15681	U1	P235/75R15		267300		-	-	-					Y	-	-	-	1994-12-09
J15682	U1	P235/75R15		267300		-	-	-					Y	-	-	-	1994-12-09
J16067	U1	P235/75R15	W2454	267300	67	0.0	0124	6230	C11	SWSEP	-		Y	-	2	-	1995-01-25
J16417	U1	P235/75R15	VH035	267300	17	0.0	0118	102	D47	SETP				-	4	-	1995-02-16
J16418	U1	P235/75R15	VH035	267300	18	0.0	0118	104	D47	SETP				-	5	-	1995-02-16
J16422	U1	P235/75R15	VH035	267300	22	0.0	0118	104	D47	SETP				-	5	-	1995-02-16
J16425	U1	P235/75R15	VH035	267300	25	0.1	0118	108	D47	SETP				-	7	-	1995-02-16
J5908	U1	P235/75R15		262555		0.2	0118	109	D21	TS			Y	0.0	10	0	1992-06-25
J6522	U1	P235/75R15		262555		0.0	0124	114	D63	SETP #2	D62		Y	0.0	1	0	1992-10-01
TEST NAME: FCE 30 SPEED CERTIFICATION - Q SPEED RATING																	
J8596	U7Q	P235/75R15		SL531J		0.3	0093	79	H05	RNF			Y	0.0	20	0	1993-02-22
J8597	U7Q	P235/75R15		SL531J		0.3	0093	79	H05	RNF			Y	0.0	20	0	1993-02-22
J8598	U7Q	P235/75R15		SL531J		0.3	0093	80	H05	RNF			Y	0.0	20	0	1993-02-22
J8599	U7Q	P235/75R15		SL531J		0.3	0093	80	H05	RNF			Y	0.0	20	0	1993-02-22
TEST NAME: FCE 30 SPEED CERTIFICATION - S SPEED RATING																	
J12112	U7S	P235/75R15		SR897J		0.3	0106	93	H05	RNF			Y	0.0	10	0	1994-01-13
TEST NAME: SAE HIGH SPEED TEST-"R" SPEED RATING																	
J8604	UR	P235/75R15		SL531J		0.1	0125	136	D47	SETP	D47		Y	0.0	4	0	1993-02-22
J8605	UR	P235/75R15		SL531J		0.1	0125	137	D47	SETP	D47		Y	0.0	6	0	1993-02-19
J8606	UR	P235/75R15		SL531J		0.0	0125	132	D47	SETP	D47		Y	0.0	3	0	1993-02-19
J8607	UR	P235/75R15		SL531J		0.1	0125	137	D47	SETP			Y	0.0	5	0	1993-02-24

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TEST NO	SPFC	TEST CODE	TEST TYPE	TIRE NO	INSPECT MILEAGE	VEH POS	REMVL CAUSE CODE1	REMVL CAUSE CODE2	ENGINEER	DESCRIPTION	SIZE
21004-07	SL531J	D6	1K HAZARD	A05	1000	RRH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-07	SL531J	D6	1K HAZARD	A06	1000	LRH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-07	SL531J	D6	1K HAZARD	A07	1000	RFH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-07	SL531J	D6	1K HAZARD	A08	1000	LFH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-66	SL531J	D6	1K HAZARD	C01	1000	RRH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-66	SL531J	D6	1K HAZARD	C02	1000	LRH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-66	SL531J	D6	1K HAZARD	C03	1000	RFH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-66	SL531J	D6	1K HAZARD	C04	1000	LFH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/25R15
21006-98	SL531J	D6	1K HAZARD	C01	983	RRH	819		KOCAJ / AU	RAD ATX TU PS (02)	P235/75R15
21006-98	SL531J	D6	1K HAZARD	C02	1000	LRH	H05		KOCAJ / AU	RAD ATX TU PS (02)	P235/75R15
21006-98	SL531J	D6	1K HAZARD	C03	1000	RFH	H05		KOCAJ / AU	RAD ATX TU PS (02)	P235/75R15
21006-98	SL531J	D6	1K HAZARD	C04	1000	LFH	H05		KOCAJ / AU	RAD ATX TU PS (02)	P235/75R15
21010-62	SL531J	D6	1K HAZARD	A01	1000	RRH	H05		PASCI/AUST	RAD ATX TU PS (02)	P235/75R15
21010-62	SL531J	D6	1K HAZARD	A02	1000	LRH	H05		PASCI/AUST	RAD ATX TU PS (02)	P235/75R15
21010-62	SL531J	D6	1K HAZARD	A03	1000	RFH	H05		PASCI/AUST	RAD ATX TU PS (02)	P235/75R15
21010-62	SL531J	D6	1K HAZARD	A04	1000	LFH	H05		PASCI/AUST	RAD ATX TU PS (02)	P235/75R15
21011-09	257968	D6	1K HAZARD	G01	1000	RRH	H05		PACSI/AUST	RAD ATX TU PS	P235/75R15
21011-09	257968	D6	1K HAZARD	G02	1000	LRH	H05		PACSI/AUST	RAD ATX TU PS	P235/75R15
21011-09	257968	D6	1K HAZARD	G03	1000	RFH	H05		PACSI/AUST	RAD ATX TU PS	P235/75R15
21011-09	257968	D6	1K HAZARD	G04	1000	LFH	H05		PACSI/AUST	RAD ATX TU PS	P235/75R15
21012-69	262555	D6	1K HAZARD	G01	1000	RRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-69	262555	D6	1K HAZARD	G02	1000	LRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-69	262555	D6	1K HAZARD	G03	1000	RFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-69	262555	D6	1K HAZARD	G04	1000	LFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-75	262555	D6	1K HAZARD	D01	1000	RRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-75	262555	D6	1K HAZARD	D02	1000	LRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-75	262555	D6	1K HAZARD	D03	1000	RFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-75	262555	D6	1K HAZARD	D04	1000	LFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21013-22	262555	D6	1K HAZARD	F01	1000	RRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21013-22	262555	D6	1K HAZARD	F02	1000	LRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21013-22	262555	D6	1K HAZARD	F03	1000	RFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21013-22	262555	D6	1K HAZARD	F04	1000	LFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21013-22	262555	D6	1K HAZARD	F05	1000	RRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21013-22	262555	D6	1K HAZARD	F06	1000	LRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21013-22	262555	D6	1K HAZARD	F07	1000	RFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21013-22	262555	D6	1K HAZARD	F08	1000	LFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-46	262555	D6	1K HAZARD	L01	1000	RRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-46	262555	D6	1K HAZARD	L02	1000	LRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-46	262555	D6	1K HAZARD	L03	1000	RFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-46	262555	D6	1K HAZARD	L04	1000	LFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-95	262555	D6	1K HAZARD	T01	1000	RRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-95	262555	D6	1K HAZARD	T02	1000	LRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-95	262555	D6	1K HAZARD	T03	1000	RFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-95	262555	D6	1K HAZARD	T04	1000	LFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21015-37	262555	D6	1K HAZARD	U01	1000	RRH	H05		TIM ROBINS	SBR ATX TUPS	P235/75R15
21015-37	262555	D6	1K HAZARD	U02	1000	LRH	H05		TIM ROBINS	SBR ATX TUPS	P235/75R15
21015-37	262555	D6	1K HAZARD	U03	1000	RFH	H05		TIM ROBINS	SBR ATX TUPS	P235/75R15

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TEST NO	SPEC	TEST CODE	TEST TYPE	TIRE NO	INSPECT MILEAGE	VEH POS	REMVL CAUSE CODE1	REMVL CAUSE CODE2	ENGINEER	DESCRIPTION	SIZE
21015-32	262555	D6	1K HAZARD	U04	1000	LFH	H05		TIM ROBINS	SBR ATX TUPS	P235/75R15
21015-69	262555	D6	1K HAZARD	K01	1000	RRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21015-69	262555	D6	1K HAZARD	K02	1000	LRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21015-69	262555	D6	1K HAZARD	K03	1000	RFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21015-69	262555	D6	1K HAZARD	K04	1000	LFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21016-58	262555	D6	1K HAZARD	E01	621	RRH	H09		MIKE REEP	SBR ATX TUPS	P235/75R15
21016-58	262555	D6	1K HAZARD	E02	621	LRH	H09		MIKE REEP	SBR ATX TUPS	P235/75R15
21016-58	262555	D6	1K HAZARD	E03	621	RFH	H09		MIKE REEP	SBR ATX TUPS	P235/75R15
21016-58	262555	D6	1K HAZARD	E04	621	LFH	H09		MIKE REEP	SBR ATX TUPS	P235/75R15
21017-92	SL531J	D6	1K HAZARD	L01	1000	RRH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21017-92	SL531J	D6	1K HAZARD	L02	1000	LRH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21017-92	SL531J	D6	1K HAZARD	L03	1000	RFH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21017-92	SL531J	D6	1K HAZARD	L04	1000	LFH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21022-88	SR897J	D6	1K HAZARD	F01	1000	RRH	H05		D.M.REEP	RAD ATX TU PS (01)	P235/75R15
21022-88	SR897J	D6	1K HAZARD	F02	1000	LRH	H05		D.M.REEP	RAD ATX TU PS (01)	P235/75R15
21022-88	SR897J	D6	1K HAZARD	F03	1000	RFH	H05		D.M.REEP	RAD ATX TU PS (01)	P235/75R15
21022-88	SR897J	D6	1K HAZARD	F04	1000	LFH	H05		D.M.REEP	RAD ATX TU PS (01)	P235/75R15
21025-49	267300	D6	1K HAZARD	M01	1000	RRH	H05		SAURER	FIRESTONE RADIAL ATX	P235/75R15
21025-49	267300	D6	1K HAZARD	M02	1000	LRH	H05		SAURER	FIRESTONE RADIAL ATX	P235/75R15
21025-49	267300	D6	1K HAZARD	M03	1000	RFH	H05		SAURER	FIRESTONE RADIAL ATX	P235/75R15
21025-49	267300	D5	1K HAZARD	M04	1000	LFH	H05		SAURER	FIRESTONE RADIAL ATX	P235/75R15
21004-65	SL531J	W4	SHOULDER WEAR	X01	4800	RRH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-65	SL531J	W4	SHOULDER WEAR	X02	4800	LRH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-65	SL531J	W4	SHOULDER WEAR	X03	4800	RFH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-65	SL531J	W4	SHOULDER WEAR	X04	4800	LFH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21010-41	SL531J	W4	SHOULDER WEAR	S01	4800	RRH	H05		T. N. COPP	RAD ATX TU PS (02)	P235/75R15
21010-41	SL531J	W4	SHOULDER WEAR	S02	4800	LRH	H05		T. N. COPP	RAD ATX TU PS (02)	P235/75R15
21010-41	SL531J	W4	SHOULDER WEAR	S03	4800	RFH	H05		T. N. COPP	RAD ATX TU PS (02)	P235/75R15
21010-41	SL531J	W4	SHOULDER WEAR	S04	4800	LFH	H05		T. N. COPP	RAD ATX TU PS (02)	P235/75R15
21010-61	SL531J	W4	SHOULDER WEAR	J01	4800	RRH	H05		PASCI/AUST	RAD ATX TU PS (02)	P235/75R15
21010-61	SL531J	W4	SHOULDER WEAR	J02	4800	LRH	H05		PASCI/AUST	RAD ATX TU PS (02)	P235/75R15
21010-61	SL531J	W4	SHOULDER WEAR	J03	4800	RFH	H05		PASCI/AUST	RAD ATX TU PS (02)	P235/75R15
21010-61	SL531J	W4	SHOULDER WEAR	J04	4800	LFH	H05		PASCI/AUST	RAD ATX TU PS (02)	P235/75R15
21012-45	262555	W4	SHOULDER WEAR	E01	3788	RRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-45	262555	W4	SHOULDER WEAR	F02	3788	LRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-45	262555	W4	SHOULDER WEAR	E03	3788	RFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-45	262555	W4	SHOULDER WEAR	E04	3788	LFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-71	262555	W4	SHOULDER WEAR	Q01	3788	RRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-71	262555	W4	SHOULDER WEAR	Q02	3788	LRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-71	262555	W4	SHOULDER WEAR	Q03	3788	RFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-71	262555	W4	SHOULDER WEAR	Q04	3788	LFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-93	262555	W4	SHOULDER WEAR	E01	3788	RRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-93	262555	W4	SHOULDER WEAR	F02	3788	LRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-93	262555	W4	SHOULDER WEAR	C03	3788	RFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-93	262555	W4	SHOULDER WEAR	E04	3788	LFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21016-92	262555	W4	SHOULDER WEAR	E01	3788	RRH	H05		D.M. REEP	SBR ATX TUPS	P235/75R15
21016-92	262555	W4	SHOULDER WEAR	E02	3788	LRH	H05		D.M. REEP	SBR ATX TUPS	P235/75R15

FLEET TESTING

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TEST NO	SPEC	TEST CODE	TEST TYPE	TIRE NO	INSPECT MILEAGE	VEH POS	REMVL CAUSE CODE1	REMVL CAUSE CODE2	ENGINEER	DESCRIPTION	SIZE
21016-92	262555	W4	SHOULDER WEAR	E03	3788	RFH	H05		D.M. REEP	SBR ATX TUPS	P235/75R15
21016-92	262555	W4	SHOULDER WEAR	E04	3788	LFH	H05		D.M. REEP	SBR ATX TUPS	P235/75R15
21017-55	SL531J	W4	SHOULDER WEAR	D01	3788	RRH	H05		MIKE REEP	RAD ATX TU PS (02)	P235/75R15
21017-55	SL531J	W4	SHOULDER WEAR	D02	3788	LRH	H05		MIKE REEP	RAD ATX TU PS (02)	P235/75R15
21017-55	SL531J	W4	SHOULDER WEAR	D03	3788	RFH	H05		MIKE REEP	RAD ATX TU PS (02)	P235/75R15
21017-55	SL531J	W4	SHOULDER WEAR	D04	3788	LFH	H05		MIKE REEP	RAD ATX TU PS (02)	P235/75R15
21017-73	SL531J	W4	SHOULDER WEAR	F01	3788	RRH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21017-73	SL531J	W4	SHOULDER WEAR	F02	3788	LRH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21017-73	SL531J	W4	SHOULDER WEAR	F03	3788	RFH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21017-73	SL531J	W4	SHOULDER WEAR	F04	3788	LFH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-22	262555	W4	SHOULDER WEAR	H01	3788	RRH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-22	262555	W4	SHOULDER WEAR	H02	3788	LRH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-22	262555	W4	SHOULDER WEAR	H03	3788	RFH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-22	262555	W4	SHOULDER WEAR	H04	3788	LFH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-22	262555	W4	SHOULDER WEAR	H05	3788	RRH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-22	262555	W4	SHOULDER WEAR	H06	3788	LRH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-22	262555	W4	SHOULDER WEAR	H07	3788	RFH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-22	262555	W4	SHOULDER WEAR	H08	3788	LFH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-22	262555	W4	SHOULDER WEAR	H09	3788	RRH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-22	262555	W4	SHOULDER WEAR	H10	3788	LRH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-22	262555	W4	SHOULDER WEAR	H11	3788	RFH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-22	262555	W4	SHOULDER WEAR	H12	3788	LFH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-22	SR897J	W4	SHOULDER WEAR	H13	3788	RRH	H05		MIKE REEP	RAD ATX TU PS (01)	P235/75R15
21018-22	SR897J	W4	SHOULDER WEAR	H14	3788	LRH	H05		MIKE REEP	RAD ATX TU PS (01)	P235/75R15
21018-22	SR897J	W4	SHOULDER WEAR	H15	3788	RFH	H05		MIKE REEP	RAD ATX TU PS (01)	P235/75R15
21018-22	SR897J	W4	SHOULDER WEAR	H16	3788	LFH	H05		MIKE REEP	RAD ATX TU PS (01)	P235/75R15
21018-23	262555	W4	SHOULDER WEAR	K01	3788	RRH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-23	262555	W4	SHOULDER WEAR	K02	3788	LRH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-23	262555	W4	SHOULDER WEAR	K03	3788	RFH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-23	262555	W4	SHOULDER WEAR	K04	3788	LFH	H05		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-44	SL531J	W4	SHOULDER WEAR	J01	3788	RRH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-44	SL531J	W4	SHOULDER WEAR	J02	3788	LRH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-44	SL531J	W4	SHOULDER WEAR	J03	3788	RFH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-44	SL531J	W4	SHOULDER WEAR	J04	3788	LFH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-44	SR897J	W4	SHOULDER WEAR	J05	3788	RRH	H05		D.M. REEP	RAD ATX TU PS (01)	P235/75R15
21018-44	SR897J	W4	SHOULDER WEAR	J06	3788	LRH	H05		D.M. REEP	RAD ATX TU PS (01)	P235/75R15
21018-44	SR897J	W4	SHOULDER WEAR	J07	3788	RFH	H05		D.M. REEP	RAD ATX TU PS (01)	P235/75R15
21018-44	SR897J	W4	SHOULDER WEAR	J08	3788	LFH	H05		D.M. REEP	RAD ATX TU PS (01)	P235/75R15
21018-48	SL531J	W4	SHOULDER WEAR	F01	3788	RRH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-48	SL531J	W4	SHOULDER WEAR	F02	3788	LRH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-48	SL531J	W4	SHOULDER WEAR	F03	3788	RFH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-48	SL531J	W4	SHOULDER WEAR	F04	3788	LFH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-48	SL531J	W4	SHOULDER WEAR	F05	3788	RRH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-48	SL531J	W4	SHOULDER WEAR	F06	3788	LRH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-48	SL531J	W4	SHOULDER WEAR	F07	3788	RFH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-48	SL531J	W4	SHOULDER WEAR	F08	3788	LFH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21020-06	SL531J	W4	SHOULDER WEAR	J01	3788	RRH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15

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TEST NO	SPEC	TEST CODE	TEST TYPE	TIRE NO	INSPECT MILEAGE	VEH POS	REMVL CAUSE CODE1	REMVL CAUSE CODE2	ENGINEER	DESCRIPTION	SIZE
21020-06	SL531J	W4	SHOULDER WEAR	J02	3788	LRH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21020-06	SL531J	W4	SHOULDER WEAR	J03	3788	RFH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21020-06	SL531J	W4	SHOULDER WEAR	J04	3788	LFH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21020-06	SL531J	W4	SHOULDER WEAR	J05	3788	RRH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21020-06	SL531J	W4	SHOULDER WEAR	J06	3788	LRH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21020-06	SL531J	W4	SHOULDER WEAR	J07	3788	RFH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21020-06	SL531J	W4	SHOULDER WEAR	J08	3788	LFH	H05		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21021-72	SR897J	W4	SHOULDER WEAR	U01	3788	RRH	H05		DAVE STEWA	RAD ATX TU PS (01)	P235/75R15
21021-72	SR897J	W4	SHOULDER WEAR	U02	3788	LRH	H05		DAVE STEWA	RAD ATX TU PS (01)	P235/75R15
21021-72	SR897J	W4	SHOULDER WEAR	U03	3788	RFH	H05		DAVE STEWA	RAD ATX TU PS (01)	P235/75R15
21021-72	SR897J	W4	SHOULDER WEAR	U04	3788	LFH	H05		DAVE STEWA	RAD ATX TU PS (01)	P235/75R15
21022-83	SR897J	W4	SHOULDER WEAR	K01	3788	RRH	H05		D.M.REEP	RAD ATX TU PS (01)	P235/75R15
21022-83	SR897J	W4	SHOULDER WEAR	K02	3788	LRH	H05		D.M.REEP	RAD ATX TU PS (01)	P235/75R15
21022-83	SR897J	W4	SHOULDER WEAR	K03	3788	RFH	H05		D.M.REEP	RAD ATX TU PS (01)	P235/75R15
21022-83	SR897J	W4	SHOULDER WEAR	K04	3788	LFH	H05		D.M.REEP	RAD ATX TU PS (01)	P235/75R15
21022-85	SR897J	W4	SHOULDER WEAR	C01	3788	RRH	H05		D.M.REEP	RAD ATX TU PS (01)	P235/75R15
21022-85	SR897J	W4	SHOULDER WEAR	C02	3788	LRH	H05		D.M.REEP	RAD ATX TU PS (01)	P235/75R15
21022-85	SR897J	W4	SHOULDER WEAR	C03	3788	RFH	H05		D.M.REEP	RAD ATX TU PS (01)	P235/75R15
21022-85	SR897J	W4	SHOULDER WEAR	C04	3788	LFH	H05		D.M.REEP	RAD ATX TU PS (01)	P235/75R15
21004-64	SL531J	W6	IRREGULAR WEAR	P01	10000	RRH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-64	SL531J	W6	IRREGULAR WEAR	P02	10000	LRH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-64	SL531J	W6	IRREGULAR WEAR	P03	10000	RFH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-64	SL531J	W6	IRREGULAR WEAR	P04	10000	LFH	H05		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21005-96	SL531J	W6	IRREGULAR WEAR	Q05	10000	RRH	H05		KOCAJ / AU	RAD ATX TU PS (02)	P235/75R15
21005-96	SL531J	W6	IRREGULAR WEAR	Q06	10000	LRH	H05		KOCAJ / AU	RAD ATX TU PS (02)	P235/75R15
21005-96	SL531J	W6	IRREGULAR WEAR	Q07	10000	RFH	H05		KOCAJ / AU	RAD ATX TU PS (02)	P235/75R15
21005-96	SL531J	W6	IRREGULAR WEAR	Q08	10000	LFH	H05		KOCAJ / AU	RAD ATX TU PS (02)	P235/75R15
21008-21	SL531J	W6	IRREGULAR WEAR	A01	10000	RRH	H05		KOCAJ/AUST	RAD ATX TU PS (02)	P235/75R15
21008-21	SL531J	W6	IRREGULAR WEAR	A02	10000	LRH	H05		KOCAJ/AUST	RAD ATX TU PS (02)	P235/75R15
21008-21	SL531J	W6	IRREGULAR WEAR	A03	10000	RFH	H05		KOCAJ/AUST	RAD ATX TU PS (02)	P235/75R15
21008-21	SL531J	W6	IRREGULAR WEAR	A04	10000	LFH	H05		KOCAJ/AUST	RAD ATX TU PS (02)	P235/75R15
21010-40	SL531J	W6	IRREGULAR WEAR	T01	10000	RRH	H05		T. N. COPP	RAD ATX TU PS (02)	P235/75R15
21010-40	SL531J	W6	IRREGULAR WEAR	T02	10000	LRH	H05		T. N. COPP	RAD ATX TU PS (02)	P235/75R15
21010-40	SL531J	W6	IRREGULAR WEAR	T03	10000	RFH	H05		T. N. COPP	RAD ATX TU PS (02)	P235/75R15
21010-40	SL531J	W6	IRREGULAR WEAR	T04	10000	LFH	H05		T. N. COPP	RAD ATX TU PS (02)	P235/75R15
21010-60	SL531J	W6	IRREGULAR WEAR	Q01	10000	RRH	H05		PASCI/AUST	RAD ATX TU PS (02)	P235/75R15
21010-60	SL531J	W6	IRREGULAR WEAR	Q02	10000	LRH	H05		PASCI/AUST	RAD ATX TU PS (02)	P235/75R15
21010-60	SL531J	W6	IRREGULAR WEAR	Q03	10000	RFH	H05		PASCI/AUST	RAD ATX TU PS (02)	P235/75R15
21010-60	SL531J	W6	IRREGULAR WEAR	Q04	10000	LFH	H05		PASCI/AUST	RAD ATX TU PS (02)	P235/75R15
21012-46	262555	W6	IRREGULAR WEAR	G01	10000	RRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-46	262555	W6	IRREGULAR WEAR	G02	10000	LRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-46	262555	W6	IRREGULAR WEAR	G03	10000	RFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-46	262555	W6	IRREGULAR WEAR	G04	10000	LFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-70	262555	W6	IRREGULAR WEAR	A01	10000	RRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-70	262555	W6	IRREGULAR WEAR	A02	10000	LRH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-70	262555	W6	IRREGULAR WEAR	A03	10000	RFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21012-70	262555	W6	IRREGULAR WEAR	A04	10000	LFH	H05		CHRIS KOCA	SBR ATX TUPS	P235/75R15

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TEST NO	SPEC	TEST CODE	TEST TYPE	TIRE NO	INSPECT MILEAGE	VEH POS	REMVL CAUSE CODE1	REMVL CAUSE CODE2	ENGINEER	DESCRIPTION	SIZE
21013-25	262555	W6	IRREGULAR WEAR	E01	10000	RRH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-25	262555	W6	IRREGULAR WEAR	E02	10000	LRH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-25	262555	W6	IRREGULAR WEAR	E03	10000	RFH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-25	262555	W6	IRREGULAR WEAR	E04	10000	LFH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-25	262555	W6	IRREGULAR WEAR	E05	7500	RRH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-25	262555	W6	IRREGULAR WEAR	E06	7500	LRH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-25	262555	W6	IRREGULAR WEAR	E07	7500	RFH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-25	262555	W6	IRREGULAR WEAR	E08	7500	LFH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-40	262555	W6	IRREGULAR WEAR	X01	7500	RRH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-40	262555	W6	IRREGULAR WEAR	X02	7500	LRH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-40	262555	W6	IRREGULAR WEAR	X03	7500	RFH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-40	262555	W6	IRREGULAR WEAR	X04	7500	LFH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-40	262555	W6	IRREGULAR WEAR	X05	7500	RRH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-40	262555	W6	IRREGULAR WEAR	X06	7500	LRH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-40	262555	W6	IRREGULAR WEAR	X07	7500	RFH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-40	262555	W6	IRREGULAR WEAR	X08	7500	LFH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-70	262555	W6	IRREGULAR WEAR	T01	10000	RRH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-70	262555	W6	IRREGULAR WEAR	T02	10000	LRH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-70	262555	W6	IRREGULAR WEAR	T03	10000	RFH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-70	262555	W6	IRREGULAR WEAR	T04	10000	LFH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-70	262555	W6	IRREGULAR WEAR	T05	10000	RRH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-70	262555	W6	IRREGULAR WEAR	T06	10000	LRH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-70	262555	W6	IRREGULAR WEAR	T07	10000	RFH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21013-70	262555	W6	IRREGULAR WEAR	T08	10000	LFH	HOS		PAUL SEKUL	SBR ATX TUPS	P235/75R15
21014-92	262555	W6	IRREGULAR WEAR	C01	10000	RRH	HOS		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-92	262555	W6	IRREGULAR WEAR	C02	10000	LRH	HOS		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-92	262555	W6	IRREGULAR WEAR	C03	10000	RFH	HOS		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21014-92	262555	W6	IRREGULAR WEAR	C04	10000	LFH	HOS		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21016-30	262555	W6	IRREGULAR WEAR	A01	10000	RRH	HOS		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21016-30	262555	W6	IRREGULAR WEAR	A02	10000	LRH	HOS		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21016-30	262555	W6	IRREGULAR WEAR	A03	10000	RFH	HOS		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21016-30	262555	W6	IRREGULAR WEAR	A04	10000	LFH	HOS		CHRIS KOCA	SBR ATX TUPS	P235/75R15
21017-54	SL531J	W6	IRREGULAR WEAR	N01	10000	RRH	HOS		MIKE REEP	RAD ATX TU PS (02)	P235/75R15
21017-54	SL531J	W6	IRREGULAR WEAR	N02	10000	LRH	HOS		MIKE REEP	RAD ATX TU PS (02)	P235/75R15
21017-54	SL531J	W6	IRREGULAR WEAR	N03	10000	RFH	HOS		MIKE REEP	RAD ATX TU PS (02)	P235/75R15
21017-54	SL531J	W6	IRREGULAR WEAR	N04	10000	LFH	HOS		MIKE REEP	RAD ATX TU PS (02)	P235/75R15
21017-74	SL531J	W6	IRREGULAR WEAR	M01	10000	RRH	HOS		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21017-74	SL531J	W6	IRREGULAR WEAR	M02	10000	LRH	HOS		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21017-74	SL531J	W6	IRREGULAR WEAR	M03	10000	RFH	HOS		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21017-74	SL531J	W6	IRREGULAR WEAR	M04	10000	LFH	HOS		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-20	262555	W6	IRREGULAR WEAR	D01	10000	RRH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-20	262555	W6	IRREGULAR WEAR	D02	10000	LRH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-20	262555	W6	IRREGULAR WEAR	D03	10000	RFH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-20	262555	W6	IRREGULAR WEAR	D04	10000	LFH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-20	262555	W6	IRREGULAR WEAR	D05	10000	RRH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-20	262555	W6	IRREGULAR WEAR	D06	10000	LRH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-20	262555	W6	IRREGULAR WEAR	D07	10000	RFH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15

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TEST NO	SPEC	TEST CODE	TEST TYPE	TIRE NO	INSPECT MILEAGE	VEH POS	REMVL CAUSE CODE1	REMVL CAUSE CODE2	ENGINEER	DESCRIPTION	SIZE
21018-20	262555	W6	IRREGULAR WEAR	B08	10000	LFH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-20	262555	W6	IRREGULAR WEAR	B09	10000	RRH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-20	262555	W6	IRREGULAR WEAR	B10	10000	LRH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-20	262555	W6	IRREGULAR WEAR	B11	10000	RFH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-20	262555	W6	IRREGULAR WEAR	B12	10000	LFH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-21	262555	W6	IRREGULAR WEAR	A01	10000	RRH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-21	262555	W6	IRREGULAR WEAR	A02	10000	LRH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-21	262555	W6	IRREGULAR WEAR	A03	10000	RFH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-21	262555	W6	IRREGULAR WEAR	A04	10000	LFH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21018-43	262555	W6	IRREGULAR WEAR	G01	10000	RRH	HOS		D.M. REEP	SBR ATX TUPS	P235/75R15
21018-43	262555	W6	IRREGULAR WEAR	G02	10000	LRH	HOS		D.M. REEP	SBR ATX TUPS	P235/75R15
21018-43	262555	W6	IRREGULAR WEAR	G03	10000	RFH	HOS		D.M. REEP	SBR ATX TUPS	P235/75R15
21018-43	262555	W6	IRREGULAR WEAR	G04	10000	LFH	HOS		D.M. REEP	SBR ATX TUPS	P235/75R15
21018-49	SL531J	W6	IRREGULAR WEAR	T01	10000	RRH	HOS		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-49	SL531J	W6	IRREGULAR WEAR	T02	10000	LRH	HOS		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-49	SL531J	W6	IRREGULAR WEAR	T03	10000	RFH	HOS		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-49	SL531J	W6	IRREGULAR WEAR	T04	10000	LFH	HOS		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-49	SL531J	W6	IRREGULAR WEAR	T05	10000	RRH	HOS		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-49	SL531J	W6	IRREGULAR WEAR	T06	10000	LRH	HOS		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-49	SL531J	W6	IRREGULAR WEAR	T07	10000	RFH	HOS		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21018-49	SL531J	W6	IRREGULAR WEAR	T08	10000	LFH	HOS		D.M. REEP	RAD ATX TU PS (02)	P235/75R15
21020-33	262555	W6	IRREGULAR WEAR	B01	10000	RRH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21020-33	262555	W6	IRREGULAR WEAR	B02	10000	LRH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21020-33	262555	W6	IRREGULAR WEAR	B03	10000	RFH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21020-33	262555	W6	IRREGULAR WEAR	B04	10000	LFH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21020-33	262555	W6	IRREGULAR WEAR	B05	10000	RRH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21020-33	262555	W6	IRREGULAR WEAR	B06	10000	LRH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21020-33	262555	W6	IRREGULAR WEAR	B07	10000	RFH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21020-33	262555	W6	IRREGULAR WEAR	B08	10000	LFH	HOS		MIKE REEP	SBR ATX TUPS	P235/75R15
21021-74	SR897J	W6	IRREGULAR WEAR	E01	10000	RRH	HOS		DAVE STEWA	RAD ATX TU PS (01)	P235/75R15
21021-74	SR897J	W6	IRREGULAR WEAR	E02	10000	LRH	HOS		DAVE STEWA	RAD ATX TU PS (01)	P235/75R15
21021-74	SR897J	W6	IRREGULAR WEAR	E03	10000	RFH	HOS		DAVE STEWA	RAD ATX TU PS (01)	P235/75R15
21021-74	SR897J	W6	IRREGULAR WEAR	E04	10000	LFH	HOS		DAVE STEWA	RAD ATX TU PS (01)	P235/75R15
21022-84	SR897J	W6	IRREGULAR WEAR	Q01	10000	RRH	HOS		D.M. REEP	RAD ATX TU PS (01)	P235/75R15
21022-84	SR897J	W6	IRREGULAR WEAR	Q02	10000	LRH	HOS		D.M. REEP	RAD ATX TU PS (01)	P235/75R15
21022-84	SR897J	W6	IRREGULAR WEAR	Q03	10000	RFH	HOS		D.M. REEP	RAD ATX TU PS (01)	P235/75R15
21022-84	SR897J	W6	IRREGULAR WEAR	Q04	10000	LFH	HOS		D.M. REEP	RAD ATX TU PS (01)	P235/75R15
21022-86	SR897J	W6	IRREGULAR WEAR	P01	10000	RRH	HOS		D.M. REEP	RAD ATX TU PS (01)	P235/75R15
21022-86	SR897J	W6	IRREGULAR WEAR	P02	10000	LRH	HOS		D.M. REEP	RAD ATX TU PS (01)	P235/75R15
21022-86	SR897J	W6	IRREGULAR WEAR	P03	10000	RFH	HOS		D.M. REEP	RAD ATX TU PS (01)	P235/75R15
21022-86	SR897J	W6	IRREGULAR WEAR	P04	10000	LFH	HOS		D.M. REEP	RAD ATX TU PS (01)	P235/75R15
21004-12	SL531J	W9	LIGHT LOAD CONSUMER WEAR	U01	20000	RRH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-12	SL531J	W9	LIGHT LOAD CONSUMER WEAR	U02	20000	LRH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-12	SL531J	W9	LIGHT LOAD CONSUMER WEAR	U03	20000	RFH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21004-12	SL531J	W9	LIGHT LOAD CONSUMER WEAR	U04	20000	LFH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21035-08	SL531J	W9	LIGHT LOAD CONSUMER WEAR	R01	20000	RRH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21035-08	SL531J	W9	LIGHT LOAD CONSUMER WEAR	R02	20000	LRH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15

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TEST NO	SPEC	TEST CONF	TEST TYPE	TIRE NO	INSPECT MILEAGE	VEH POS	REMVL CAUSE CODE1	REMVL CAUSE CODE2	ENGINEER	DESCRIPTION	SIZE
21005-08	SL531J	W9	LIGHT LOAD CONSUMER WEAR	R03	20000	RFH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
21005-08	SL531J	W9	LIGHT LOAD CONSUMER WEAR	R04	20000	LFH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-58	SL531J	27	OUTSIDE	C01	3784	LFH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-58	SL531J	27	OUTSIDE	C02	3784	RFH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-58	SL531J	27	OUTSIDE	C03	3784	LRH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-58	SL531J	27	OUTSIDE	C04	3784	RRH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-62	SL531J	27	OUTSIDE	B01	10125	LFH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-62	SL531J	27	OUTSIDE	B02	10125	RFH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-62	SL531J	27	OUTSIDE	B03	10125	RRH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-62	SL531J	27	OUTSIDE	B04	10125	LRH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-78	SL531J	27	OUTSIDE	C01	3784	LFH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-78	SL531J	27	OUTSIDE	C02	3784	RFH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-78	SL531J	27	OUTSIDE	C03	3784	LRH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-78	SL531J	27	OUTSIDE	C04	3784	RRH	HOS		C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-85	SL531J	27	OUTSIDE	A01	4500	LFH			C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-85	SL531J	27	OUTSIDE	A02	4500	RFH			C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-85	SL531J	27	OUTSIDE	A03	4500	RRH			C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-85	SL531J	27	OUTSIDE	A04	4500	LRH			C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-85	SL531J	27	OUTSIDE	B01	4500	LFH			C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-85	SL531J	27	OUTSIDE	B02	4500	RFH			C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-85	SL531J	27	OUTSIDE	B03	4500	RRH			C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06000-85	SL531J	27	OUTSIDE	B04	4500	LRH			C. KOCAJ	RAD ATX TU PS (02)	P235/75R15
06001-09	257968	27	OUTSIDE	A01	3784	LF			PASCI/AUST	RAD ATX TU PS	P235/75R15
06001-09	257968	27	OUTSIDE	A02	3784	RF			PASCI/AUST	RAD ATX TU PS	P235/75R15
06001-09	257968	27	OUTSIDE	A03	3784	LR			PASCI/AUST	RAD ATX TU PS	P235/75R15
06001-09	257968	27	OUTSIDE	A04	3784	RR			PASCI/AUST	RAD ATX TU PS	P235/75R15
06001-11	257968	27	OUTSIDE	A01	10000	LF	HOS		PASCI/AUST	RAD ATX TU PS	P235/75R15
06001-11	257968	27	OUTSIDE	A02	10000	RF	HOS		PASCI/AUST	RAD ATX TU PS	P235/75R15
06001-11	257968	27	OUTSIDE	A03	10000	LR	HOS		PASCI/AUST	RAD ATX TU PS	P235/75R15
06001-11	257968	27	OUTSIDE	A04	10000	RR	HOS		PASCI/AUST	RAD ATX TU PS	P235/75R15
06001-26	262555	27	OUTSIDE	A01	10000	LF			C. KOCAJ/B	SBR ATX TUPS	P235/75R15
06001-26	262555	27	OUTSIDE	A02	10000	RF			C. KOCAJ/B	SBR ATX TUPS	P235/75R15
06001-26	262555	27	OUTSIDE	A03	10000	LR			C. KOCAJ/B	SBR ATX TUPS	P235/75R15
06001-26	262555	27	OUTSIDE	A04	10000	RR			C. KOCAJ/B	SBR ATX TUPS	P235/75R15
06001-32	262555	27	OUTSIDE	A01	10000	LF			P. SEKULA	SBR ATX TUPS	P235/75R15
06001-32	262555	27	OUTSIDE	A02	10000	RF			P. SEKULA	SBR ATX TUPS	P235/75R15
06001-32	262555	27	OUTSIDE	A03	10000	LR			P. SEKULA	SBR ATX TUPS	P235/75R15
06001-32	262555	27	OUTSIDE	A04	10000	RR			P. SEKULA	SBR ATX TUPS	P235/75R15
06001-33	262555	27	OUTSIDE	A01	10000	LF			CHRIS KOCA	SBR ATX TUPS	P235/75R15
06001-33	262555	27	OUTSIDE	A02	10000	RF			CHRIS KOCA	SBR ATX TUPS	P235/75R15
06001-33	262555	27	OUTSIDE	A03	10000	LR			CHRIS KOCA	SBR ATX TUPS	P235/75R15
06001-33	262555	27	OUTSIDE	A04	10000	RR			CHRIS KOCA	SBR ATX TUPS	P235/75R15
06001-34	262555	27	OUTSIDE	A01	3784	LF			CHRIS KOCA	SBR ATX TUPS	P235/75R15
06001-34	262555	27	OUTSIDE	A02	3784	RF			CHRIS KOCA	SBR ATX TUPS	P235/75R15
06001-34	262555	27	OUTSIDE	A03	3784	LR			CHRIS KOCA	SBR ATX TUPS	P235/75R15
06001-34	262555	27	OUTSIDE	A04	3784	RR			CHRIS KOCA	SBR ATX TUPS	P235/75R15
06001-53	262555	27	OUTSIDE	A01	3784	LF			MIKE REED	SBR ATX TUPS	P235/75R15

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FLEET TESTING CONFIDENTIAL

TEST NO	SPEC	TEST CODE	TEST TYPE	TIRE NO	INSPECT MILEAGE	VEH POS	REMVL CAUSE CODE1	REMVL CAUSE CODE2	ENGINEER	DESCRIPTION	SIZE
06001-53	262555	27	OUTSIDE	A02	3784	RF			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-53	262555	27	OUTSIDE	A03	3784	LR			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-53	262555	27	OUTSIDE	A04	3784	RR			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-53	262555	27	OUTSIDE	B01	3784	LF			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-53	262555	27	OUTSIDE	B02	3784	RF			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-53	262555	27	OUTSIDE	B03	3784	LR			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-53	262555	27	OUTSIDE	B04	3784	RR			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-54	262555	27	OUTSIDE	A01	10000	LF			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-54	262555	27	OUTSIDE	A02	10000	RF			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-54	262555	27	OUTSIDE	A03	10000	LR			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-54	262555	27	OUTSIDE	A04	10000	RR			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-54	262555	27	OUTSIDE	B01	10000	LF			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-54	262555	27	OUTSIDE	B02	10000	RF			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-54	262555	27	OUTSIDE	B03	10000	LR			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-54	262555	27	OUTSIDE	B04	10000	RR			MIKE REEP	SBR ATX TUPS	P235/75R15
06001-71	SL531J	27	OUTSIDE	A01	10000	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-71	SL531J	27	OUTSIDE	A02	10000	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-71	SL531J	27	OUTSIDE	A03	10000	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-71	SL531J	27	OUTSIDE	A04	10000	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-71	SL531J	27	OUTSIDE	B01	10000	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-71	SL531J	27	OUTSIDE	B02	10000	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-71	SL531J	27	OUTSIDE	B03	10000	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-71	SL531J	27	OUTSIDE	B04	10000	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-71	SL531J	27	OUTSIDE	C03	10000	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-71	SL531J	27	OUTSIDE	C04	10000	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-71	SL531J	27	OUTSIDE	C05	10000	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-71	SL531J	27	OUTSIDE	C06	10000	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-72	SL531J	27	OUTSIDE	A01	3784	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-72	SL531J	27	OUTSIDE	A02	3784	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-72	SL531J	27	OUTSIDE	A03	3784	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-72	SL531J	27	OUTSIDE	A04	3784	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-72	SL531J	27	OUTSIDE	B01	3784	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-72	SL531J	27	OUTSIDE	B02	3784	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-72	SL531J	27	OUTSIDE	B03	3784	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-72	SL531J	27	OUTSIDE	B04	3784	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-72	SL531J	27	OUTSIDE	C01	3784	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-72	SL531J	27	OUTSIDE	C02	3784	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-72	SL531J	27	OUTSIDE	C03	3784	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-72	SL531J	27	OUTSIDE	C04	3784	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	A01	10000	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	A02	10000	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	A03	10000	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	A04	10000	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	B01	10000	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	B02	10000	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	B03	10000	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	B04	10000	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15

FLEET TESTING

CONFIDENTIAL

TEST NO	SPEC	TEST CODE	TEST TYPE	TIRE NO	INSPECT MILEAGE	VEH POS	REMVL CAUSE CODE1	REMVL CAUSE CODE2	ENGINEER	DESCRIPTION	SIZE
06001-75	SL531J	27	OUTSIDE	C01	10000	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	C02	10000	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	C03	10000	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	C04	10000	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	D01	10000	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	D02	10000	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	D03	10000	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-75	SL531J	27	OUTSIDE	D04	10000	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	A01	3784	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	A02	3784	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	A03	3784	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	A04	3784	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	B01	3784	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	B02	3784	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	B03	3784	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	B04	3784	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	C01	3784	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	C02	3784	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	C03	3784	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	C04	3784	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	D01	3784	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	D02	3784	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	D03	3784	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-76	SL531J	27	OUTSIDE	D04	3784	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-85	SL531J	27	OUTSIDE	A01	10000	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-85	SL531J	27	OUTSIDE	A02	10000	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-85	SL531J	27	OUTSIDE	A03	10000	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-85	SL531J	27	OUTSIDE	A04	10000	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-85	SL531J	27	OUTSIDE	B01	10000	LF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-85	SL531J	27	OUTSIDE	B02	10000	RF			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-85	SL531J	27	OUTSIDE	B03	10000	LR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-85	SL531J	27	OUTSIDE	B04	10000	RR			D.M. REEP	RAD ATX TU PS (02)	P235/75R15
06001-87	SL531J	27	OUTSIDE	A01	3784	LF			MIKE REEP	RAD ATX TU PS (02)	P235/75R15
06001-87	SL531J	27	OUTSIDE	A02	3784	RF			MIKE REEP	RAD ATX TU PS (02)	P235/75R15
06001-87	SL531J	27	OUTSIDE	A03	3784	LR			MIKE REEP	RAD ATX TU PS (02)	P235/75R15
06001-87	SL531J	27	OUTSIDE	A04	3784	RR			MIKE REEP	RAD ATX TU PS (02)	P235/75R15

Ford Motor Company

Jacques A. Nasser
President and
Chief Executive Officer

September 19, 2000

The Honorable W. J. Tauzin, Chairman
Subcommittee on Telecommunications,
Trade and Consumer Protection
Committee on Commerce
United States House of Representatives
2125 Rayburn House Office Building
Washington, D.C. 20515-6115

The Honorable Fred Upton, Chairman
Subcommittee on Oversight and Investigations
Committee on Commerce
United States House of Representatives
2125 Rayburn House Office Building
Washington, D.C. 20515-6115

Dear Chairman Tauzin and Chairman Upton:

I am in the process of reviewing the testimony that I gave before your Subcommittees on Tuesday, September 5 to ensure that it is accurate and responsive. As additional relevant information is developed, we will submit it for the record, and I remain prepared to answer the Subcommittees' questions.

Based upon the review to date, there is one point that bears clarification. During my testimony, Chairman Tauzin asked me whether in the early stages of development of the Explorer vehicles, Ford requested Firestone to conduct "high-speed" tests at 26 pounds per square inch of the tires that are now subject to recall. Based on the information available to me at the time, I responded that Ford did request such tests. As noted in the letter to the Subcommittees dated September 15, 2000, from Ford executives Helen Petrauskas and Thomas Baughman, and the testing documents which Ford has provided the Subcommittees, that answer appears not to be accurate with respect to the early division of responsibility between Ford Motor Company and Firestone. Ford, not Firestone, performed the "high-speed" testing on the tires at 26 pounds per square inch at its Arizona Proving Grounds. I described the Ford tests in my testimony.

Since early 1998, Firestone has been required to perform a high-speed dynamometer test at the vehicle manufacturer's recommended cold tire pressure (26 psi in the case of the

One American Road, Dearborn, Michigan 48126-2798 USA

recalled tires). Firestone, as have other tire vendors, always has been required by Ford engineering specifications to deliver tires for the Ford Explorer that meet certain functional and high-speed criteria at a recommended vehicle manufacturer's tire pressure.

I trust that the above clarification is responsive to the Committee's inquiry.

Very truly yours,

Jacques Nasser

cc: The Honorable Edward J. Markey
Ranking Minority Member
Telecommunications, Trade and
Consumer Protection Subcommittee

The Honorable Ron Klink
Ranking Minority Member
Oversight and Investigations Subcommittee
House Committee on Commerce

Members of the House Committee on Commerce

Mark Paoletta, Esq.
Chief Counsel for Oversight and Investigations
House Committee on Commerce

Reid P. F. Stuntz, Esq.
Minority Staff Director/Chief Counsel
House Committee on Commerce

AFFIDAVIT OF JAMES D. AVOURIS

STATE OF MICHIGAN)
)
COUNTY OF WAYNE)

I, James D. Avouris, being duly sworn, state as follows:

1. I am over the age of 18, and except where otherwise indicated, I have personal knowledge of the facts stated in this affidavit, and if called as a witness, I would be competent to testify to them.

2. I am currently retired from Ford Motor Company ("Ford"). I was an employee at Ford's Research and Engineering Center in Dearborn, Michigan for 28 years, during which time I held several positions in the tire, wheel and chassis design and development. In 1984, I became the Light Truck Engineering Technical Specialist in tire mechanics. When I retired, effective January 1, 1999, I was a Staff Technical Specialist, Tire Mechanics, Chassis Components/Advanced Vehicle Technology.

3. During my employment as Light Truck Engineering technical specialist in tire mechanics, I was involved with the design, development and testing of the tires, wheels and vehicle system for the UN46 Explorer program (1991-1994 model years), including the Firestone P235/75R15 ATX and P225/70R15 AS tires.

4. I was involved in conducting various tests to evaluate the tire performance on the UN46 Explorer, including the Tire High Speed Durability test. In 1989, Ford conducted the Tire High Speed Durability test at the Arizona Proving Grounds. The Tire High Speed Durability test is conducted by running the vehicle for 200 miles at a minimum of 90 mph at ambient temperatures in the range of 90° Fahrenheit. The acceptance criteria for the test requires that the tire vehicle system must achieve a minimum of 100 miles at that speed and temperature. The Tire High

Speed Durability tests run on the UN46 Explorer were conducted at the maximum rear gross axle weight rating (GAWR) with the tire pressure for both the front and the rear set at 26 p.s.i.

5. The UN46 Explorer met Light Truck Engineering's requirements for the High Speed Durability Tire tests, and the results of the test were documented; however, I am informed that those documents no longer exist at Ford due to the passage of time.

Further affiant sayeth naught.

James Avouris
James Avouris

WITNESS my hand at office this 11TH day of SEPT., 2000.

Kathryn M. Lewinski
Notary Public

KATHRYN M LEWINSKI
Notary Public, Wayne County, MI
My Commission Expires Mar 5, 2004

TEST TYPE=> DUR WAREHOUSE ORDER NO: J5742
FORD HIGH SPEED
PROJECT NO. => 141FM001 NON STD TEST =>Y DATE => 2000-07-07
TEST NO. => J45527 NEED BY =>2000-07-10 SERIAL=>
TEST CODE => U5 SIZE => P235/75R15 S SPEED RATING=>
REV DATE =>0001-01-01 REV TIME =>00:00:00 OE CONST NO=>
SPEC NO => 280105 —27 DESIGN NO => P1255AT1A1
INFL => 26.0 PSI LOAD => 2028.0 LBS. RIM => 7.00
INFL => 179 KPA LOAD => 9020.0 NWT NO. OF TIRES => 1
BREAKIN =>VARIES FOR=>10 MIN AMBIENT TEMP=>100F+-5 F
TIRE DESCRIPTION => FIRESTONE WILDERNESS AT
GENERAL FEATURES => FIRESTONE WILDERNESS AT
USE DASH NO =>
SOURCE => TRA GOAL/MAX SPEED => 106.00
REMARKS => '80105J' WRITTEN ON SOWL

PRIORITY

MTO 7-7-00 5% 2ND BV

CUSTOMER => FORD WHEEL MATERIAL=> W2HL1PY 2100

REQUESTOR:TSOTDS4 T3 ENGINEER: QUEISER PHONE: 6622
MACHINE: T3 STATION: 1
DISPOSITION: INSPECTION RACKS
END REMARKS:
DATE COMPLETE YR ____- MO. __ -DA __ OPERATOR________

STEP NO	LOAD LB	LOAD NWT	INFL PSI	INFL KPA	STEP → SPEED	CAP/ REG	STEP DUR	DUR UNIT	STEP REF LOAD	STEP REF INFL
1	1500	6670	26.0	179.2	14.00		2.00	MIN	2028	26.0
2	1500	6670	26.0	179.2	27.00		2.00	MIN	2028	26.0
3	1500	6670	26.0	179.2	41.00		2.00	MIN	2028	26.0
4	1500	6670	26.0	179.2	54.00		2.00	MIN	2028	26.0
5	1500	6670	26.0	179.2	67.00		2.00	MIN	2028	26.0
6	1500	6670	26.0	179.2	81.00		10.00	MIN	2028	26.0
7	1500	6670	26.0	179.2	87.00		10.00	MIN	2028	26.0
8	1500	6670	26.0	179.2	94.00		10.00	MIN	2028	26.0
9	1500	6670	26.0	179.2	100.00		10.00	MIN	2028	26.0
10	1500	6670	26.0	179.2	106.00		10.00	MIN	2028	26.0
11	1500	6670	26.0	179.2	112.00		10.00	MIN	2028	26.0
12	1500	6670	26.0	179.2	118.00		10.00	MIN	2028	26.0
13	1500	6670	26.0	179.2	125.00		10.00	MIN	2028	26.0
14	1500	6670	26.0	179.2	131.00		10.00	MIN	2028	26.0
15	1500	6670	26.0	179.2	137.00		10.00	MIN	2028	26.0
16	1500	6670	26.0	179.2	143.00		10.00	MIN	2028	26.0
17	1500	6670	26.0	179.2	149.00		10.00	MIN	2028	26.0
18	1500	6670	26.0	179.2	156.00		10.00	MIN	2028	26.0
19	1500	6670	26.0	179.2	162.00		10.00	MIN	2028	26.0
20	1500	6670	26.0	179.2	168.00		10.00	MIN	2028	26.0

CLOCK TIME	DATE	ON OR OFF	OPER.	DRUM COUNTER	MILEAGE	DRUM		LOAD	INFL.	R.T.	TOTAL ~~HOURS~~ Min
						R.P.M.	M.P.H.				
4^{19} A	7 8	ON	BY	BC	0		14	1500	26	100	0
5^{28} A	7 8	OFF	BY	BC	100.4		112	1500	32	105	68.43

8.40 min @ 112 MPH

OSS WALL SEP
32 PSI

POS.	SECTION		ARC		CHORD	
	NEW PSI		NEW PSI		NEW PSI	
1						
2						
3						
4						
5						
6						
AVG.						

CUT GROWTH MEASUREMENTS

POS.	GROOVES - SS TO OSS				
	1	2	3	4	
1					
2					
3					
4					

SERIAL SIZE MACHINE T3 STATION 1 TEST NO.

TEST PROJ.

049-01091 3-85

```
       TEST DATE:  07/08/2000
  PROJECT NUMBER:  141FM001
     TEST NUMBER:  J45527
       TEST CODE:  U5
     SPEC NUMBER:  280105
     DASH NUMBER:  27
   D.O.T. NUMBER:  W2HLIPY2100
        ENGINEER:  QUEISER
       TIRE SIZE:  P235/75R15
        RIM SIZE:  7.00
TIRE DESCRIPTION:  WILD.AT
DESIGN LOAD(LBS):  1500
 TEST INFL.(PSI):  26
     MACHINE I.D.:  T3
  STATION NUMBER:  1
   TEST OPERATOR:  BILL G.

       TEST CODE:  U5

      START TIME:  04:19:50
       STOP TIME:  05:28:16

STATION 1 TOTAL ELAPSED TEST TIME:   68.43  minutes

STEP    STEP              STATION 1                STEP     TOTAL
 NO. START TIME *****STEP ELAPSED TIME*****  MILEAGE  MILEAGE  LOAD   TEMP
  1    04:19:50    2.00 Minutes(s) @ 14.3 MPH    0.5       0.5   1501   99.5
  2    04:21:50    2.00 Minutes(s) @ 27.3 MPH    0.9       1.4   1498   98.8
  3    04:23:50    2.00 Minutes(s) @ 40.9 MPH    1.4       2.7   1496   98.5
  4    04:25:50    2.00 Minutes(s) @ 54.2 MPH    1.8       4.5   1503   99.0
  5    04:27:50    2.00 Minutes(s) @ 67.3 MPH    2.2       6.8   1499   99.1
  6    04:29:50   10.00 Minutes(s) @ 81.1 MPH   13.5      20.3   1500   96.2
  7    04:39:51   10.00 Minutes(s) @ 87.0 MPH   14.5      34.8   1499  101.0
  8    04:49:51   10.00 Minutes(s) @ 93.9 MPH   15.7      50.4   1498  102.1
  9    04:59:51   10.00 Minutes(s) @ 99.7 MPH   16.7      67.1   1499  101.3
 10    05:09:52   10.00 Minutes(s) @105.9 MPH   17.7      84.8   1503   92.2
 11    05:19:52    8.40 Minutes(s) @112.0 MPH   15.7     100.4   1500  105.3
```

OSS WALL SEP
32 PSI

```
TEST TYPE=> DUR                                          WAREHOUSE ORDER NO: J5742
FORD HIGH SPEED
PROJECT NO. => 141FM001    NON STD TEST =>Y              DATE => 2000-07-07
TEST NO. => J45528         NEED BY =>2000-07-10          SERIAL=>
TEST CODE => U5            SIZE => P235/75R15      S     SPEED RATING=>
REV DATE =>0001-01-01      REV TIME =>00:00:00           OE CONST NO=>
SPEC NO => 280105-28       DESIGN NO => P1255AT1A1
INFL =>   26.0  PSI        LOAD => 2028.0   LBS.         RIM =>  7.00
INFL =>    179  KPA        LOAD =>  9020.0  NWT          NO. OF TIRES =>   1
BREAKIN =>VARIES           FOR=>10  MIN         AMBIENT TEMP=>100F+-5 F
TIRE DESCRIPTION => FIRESTONE WILDERNESS AT
GENERAL FEATURES => FIRESTONE WILDERNESS AT
USE DASH NO =>
SOURCE => TRA              GOAL/MAX SPEED => 106.00
REMARKS => '80105J' WRITTEN ON SDWL

CUSTOMER => FORD           WHEEL MATERIAL=>
==============================================================================
REQUESTOR:TSOTDS4           ENGINEER: QUEISER                 PHONE: 6622
MACHINE:_____T3____        STATION:__1_____
DISPOSITION: INSP. RACKS
END REMARKS: _________________________________________________________________
DATE COMPLETE  YR ____- MO ___ -DA __        OPERATOR_______________
==============================================================================

STEP LOAD   LOAD   INFL   INFL   STEP    CAP/  STEP       DUR   STEP REF STEP REF
NO    LB    NWT    PSI    KPA    SPEED   REG   DUR        UNIT   LOAD     INFL
---- -----  -----  -----  -----  -----   ----- ---------  ----- -------- --------
 1    1500   6670   26.0  179.2   14.00              2.00 MIN       2028     26.0
 2    1500   6670   26.0  179.2   27.00              2.00 MIN       2028     26.0
 3    1500   6670   26.0  179.2   41.00              2.00 MIN       2028     26.0
 4    1500   6670   26.0  179.2   54.00              2.00 MIN       2028     26.0
 5    1500   6670   26.0  179.2   67.00              2.00 MIN       2028     26.0
 6    1500   6670   26.0  179.2   81.00             10.00 MIN       2028     26.0
 7    1500   6670   26.0  179.2   87.00             10.00 MIN       2028     26.0
 8    1500   6670   26.0  179.2   94.00             10.00 MIN       2028     26.0
 9    1500   6670   26.0  179.2  100.00             10.00 MIN       2028     26.0
10    1500   6670   26.0  179.2  106.00             10.00 MIN       2028     26.0
11    1500   6670   26.0  179.2  112.00             10.00 MIN       2028     26.0
12    1500   6670   26.0  179.2  118.00             10.00 MIN       2028     26.0
13    1500   6670   26.0  179.2  125.00             10.00 MIN       2028     26.0
14    1500   6670   26.0  179.2  131.00             10.00 MIN       2028     26.0
15    1500   6670   26.0  179.2  137.00             10.00 MIN       2028     26.0
16    1500   6670   26.0  179.2  143.00             10.00 MIN       2028     26.0
17    1500   6670   26.0  179.2  149.00             10.00 MIN       2028     26.0
18    1500   6670   26.0  179.2  156.00             10.00 MIN       2028     26.0
19    1500   6670   26.0  179.2  162.00             10.00 MIN       2028     26.0
20    1500   6670   26.0  179.2  168.00             10.00 MIN       2028     26.0
```

PRIORITY

MTD 7-7-00
2ND 458 BV
W2HL 1PY 2100

CLOCK TIME	DATE	ON OR OFF	OPER.	DRUM COUNTER	MILEAGE	DRUM		LOAD	INFL.	R.T.	Min TOTAL ~~HOURS~~
						R.P.M.	M.P.H.				
2¹⁹A	7 8	ON	BJ	BC	0		14	1500	26	100	0
3²⁵A	7 8	OFF	BJ	BC	96.2		112	1500	31	105	66.15

6.12 min @ 112 MPH

OSS
Shoulder Sep
31 PSI

POS.	SECTION		ARC		CHORD		CUT GROWTH MEASUREMENTS						
	NEW PSI		NEW PSI		NEW PSI		POS.	GROOVES - SS TO OSS					
1								1	2	3	4		
2							1						
3							2						
4							3						
5							4						
6													
AVG.													

SERIAL SIZE MACHINE 73 STATION 1 TEST NO.

TEST PROJ.

049-01091 3-85

```
        TEST DATE:  07/08/2000
   PROJECT NUMBER:  141FM001
      TEST NUMBER:  J45528
        TEST CODE:  U5
      SPEC NUMBER:  280105
      DASH NUMBER:  28
    D.O.T. NUMBER:  W2HLIPY2100
         ENGINEER:  QUEISER
        TIRE SIZE:  P235/75R15
         RIM SIZE:  7.00
 TIRE DESCRIPTION:  WILD.AT
DESIGN LOAD(LBS):   1500
 TEST INFL.(PSI):   26
    MACHINE I.D.:   T3
  STATION NUMBER:   1
   TEST OPERATOR:   BILL G.

       TEST CODE:   U5

      START TIME:   02:19:27
       STOP TIME:   03:25:36

STATION 1 TOTAL ELAPSED TEST TIME:   66.15  minutes

STEP    STEP              STATION 1                STEP     TOTAL
 NO. START TIME *****STEP ELAPSED TIME*****     MILEAGE  MILEAGE  LOAD   TEMP
  1   02:19:27    2.00 Minutes(s) @ 14.3 MPH      0.5      0.5    1499  100.1
  2   02:21:27    2.00 Minutes(s) @ 27.3 MPH      0.9      1.4    1497  100.2
  3   02:23:27    2.00 Minutes(s) @ 40.8 MPH      1.4      2.7    1502   99.6
  4   02:25:27    2.00 Minutes(s) @ 54.3 MPH      1.8      4.5    1502   99.8
  5   02:27:27    2.00 Minutes(s) @ 67.4 MPH      2.2      6.8    1502  101.0
  6   02:29:27   10.00 Minutes(s) @ 80.9 MPH     13.5     20.3    1501  103.4
  7   02:39:27   10.00 Minutes(s) @ 87.1 MPH     14.5     34.8    1499  104.0
  8   02:49:28   10.00 Minutes(s) @ 94.1 MPH     15.7     50.4    1498   91.4
  9   02:59:28   10.00 Minutes(s) @ 99.9 MPH     16.7     67.1    1498  104.4
 10   03:09:28   10.00 Minutes(s) @105.9 MPH     17.7     84.8    1499   95.9
 11   03:19:29    6.12 Minutes(s) @112.0 MPH     11.4     96.2    1500  105.0
```

OSS Shoulder Sep

31 PSI

```
TEST TYPE=> DUR                                    WAREHOUSE ORDER NO: J5742
FORD HIGH SPEED
PROJECT NO. => 141FM001     NON STD TEST =>Y                DATE => 2000-07-07
TEST NO. => J45529          NEED BY =>2000-07-10            SERIAL=>
TEST CODE => US             SIZE => P235/75R15      S       SPEED RATING=>
REV DATE =>0001-01-01       REV TIME =>00:00:00             OE CONST NO=>
SPEC NO => 280105-29        DESIGN NO => P1255AT1A1
INFL =>   26.0  PSI         LOAD => 2028.0   LBS.           RIM =>  7.00
INFL =>   179  KPA          LOAD =>  9020.0  NWT            NO. OF TIRES =>   1
BREAKIN =>VARIES            FOR=>10  MIN          AMBIENT TEMP=>100F+-5 F
TIRE DESCRIPTION => FIRESTONE WILDERNESS AT
GENERAL FEATURES => FIRESTONE WILDERNESS AT                 PRIORITY
USE DASH NO =>
SOURCE => TRA               GOAL/MAX SPEED => 106.00
REMARKS => '80105J' WRITTEN ON SDWL              MTA 7-7-00 5% 2ND DV

CUSTOMER => FORD            WHEEL MATERIAL=>   W2HL1PY2100
=============================================================================
REQUESTOR:TSOTDS4   13        ENGINEER: QUEISER            PHONE: 6622
MACHINE:____________          STATION:___3___
DISPOSITION: INSP. RACKS
END REMARKS: _______________________________________________________________
DATE COMPLETE  YR ____- MO __ -DA __        OPERATOR________________
=============================================================================

STEP LOAD   LOAD  INFL   INFL  STEP   CAP/  STEP      DUR   STEP REF STEP REF
NO    LB    NWT   PSI    KPA   SPEED  REG   DUR       UNIT   LOAD     INFL
---- -----  ----- -----  ----- -----  ----- --------  ----- -------  -------
 1    1500  6670  26.0  179.2   14.00            2.00 MIN      2028     26.0
 2    1500  6670  26.0  179.2   27.00            2.00 MIN      2028     26.0
 3    1500  6670  26.0  179.2   41.00            2.00 MIN      2028     26.0
 4    1500  6670  26.0  179.2   54.00            2.00 MIN      2028     26.0
 5    1500  6670  26.0  179.2   67.00            2.00 MIN      2028     26.0
 6    1500  6670  26.0  179.2   81.00           10.00 MIN      2028     26.0
 7    1500  6670  26.0  179.2   87.00           10.00 MIN      2028     26.0
 8    1500  6670  26.0  179.2   94.00           10.00 MIN      2028     26.0
 9    1500  6670  26.0  179.2  100.00           10.00 MIN      2028     26.0
10    1500  6670  26.0  179.2  106.00           10.00 MIN      2028     26.0
11    1500  6670  26.0  179.2  112.00           10.00 MIN      2028     26.0
12    1500  6670  26.0  179.2  118.00           10.00 MIN      2028     26.0
13    1500  6670  26.0  179.2  125.00           10.00 MIN      2028     26.0
14    1500  6670  26.0  179.2  131.00           10.00 MIN      2028     26.0
15    1500  6670  26.0  179.2  137.00           10.00 MIN      2028     26.0
16    1500  6670  26.0  179.2  143.00           10.00 MIN      2028     26.0
17    1500  6670  26.0  179.2  149.00           10.00 MIN      2028     26.0
18    1500  6670  26.0  179.2  156.00           10.00 MIN      2028     26.0
19    1500  6670  26.0  179.2  162.00           10.00 MIN      2028     26.0
20    1500  6670  26.0  179.2  168.00           10.00 MIN      2028     26.0
```

CLOCK TIME	DATE	ON OR OFF	OPER.	DRUM COUNTER	MILEAGE	DRUM R.P.M.	DRUM M.P.H.	LOAD	INFL.	R.T.	Mi H TOTAL ~~HOURS~~
6 719 P	7 8	ON	BJ	BC	0		14	1500	26	100	0
325 A	7 8	OFF	BJ	BC	95.8		112	1500	31	102	65.95

5.92 Min @ 112 MPH

OSS Shoulder Sep

31 Psi

POS.	SECTION NEW PSI		ARC NEW PSI		CHORD NEW PSI	
1						
2						
3						
4						
5						
6						
AVG.						

CUT GROWTH MEASUREMENTS

POS.	GROOVES - SS TO OSS 1	2	3	4	
1					
2					
3					
4					

SERIAL SIZE MACHINE T3 STATION 3 TEST NO.

TEST PROJ.

049-01091 3-85

```
       TEST DATE:  07/08/2000
  PROJECT NUMBER:  141FM001
     TEST NUMBER:  J45529
       TEST CODE:  U5
     SPEC NUMBER:  280105
     DASH NUMBER:  29
   D.O.T. NUMBER:  W2HLIPY2100
        ENGINEER:  QUEISER
       TIRE SIZE:  P235/75R15
        RIM SIZE:  7.00
TIRE DESCRIPTION:  WILD.AT
DESIGN LOAD(LBS):  1500
 TEST INFL.(PSI):  26
    MACHINE I.D.:  T3
  STATION NUMBER:  3
   TEST OPERATOR:  BILL G.

       TEST CODE:  U5

      START TIME:  02:19:27
       STOP TIME:  03:25:24

STATION 3 TOTAL ELAPSED TEST TIME:   65.95  minutes

STEP   STEP              STATION 3            STEP     TOTAL
 NO. START TIME *****STEP ELAPSED TIME*****  MILEAGE  MILEAGE LOAD  TEMP
 1    02:19:27    2.00 Minutes(s) @ 14.3 MPH    0.5      0.5   1497   97.0
 2    02:21:27    2.00 Minutes(s) @ 27.3 MPH    0.9      1.4   1501   97.1
 3    02:23:27    2.00 Minutes(s) @ 40.8 MPH    1.4      2.7   1503   97.2
 4    02:25:27    2.00 Minutes(s) @ 54.3 MPH    1.8      4.5   1499   97.6
 5    02:27:27    2.00 Minutes(s) @ 67.4 MPH    2.2      6.8   1501   98.0
 6    02:29:27   10.00 Minutes(s) @ 80.9 MPH   13.5     20.3   1501   99.7
 7    02:39:27   10.00 Minutes(s) @ 87.1 MPH   14.5     34.8   1499  101.0
 8    02:49:28   10.00 Minutes(s) @ 94.1 MPH   15.7     50.4   1502   92.4
 9    02:59:28   10.00 Minutes(s) @ 99.9 MPH   16.7     67.1   1501  101.6
10    03:09:28   10.00 Minutes(s) @105.9 MPH   17.7     84.8   1499   95.6
11    03:19:29    5.92 Minutes(s) @112.0 MPH   11.1     95.8   1500  102.4
```

OSS Shoulder Sep

31 PSI

```
TEST TYPE=> DUR                                               WAREHOUSE ORDER NO: J5742
FORD HIGH SPEED
PROJECT NO. => 141FM001      NON STD TEST =>Y                   DATE => 2000-07-07
TEST NO. => J45530           NEED BY =>2000-07-10               SERIAL=>
TEST CODE => U5              SIZE => P235/75R15      S          SPEED RATING=>
REV DATE =>0001-01-01        REV TIME =>00:00:00                OE CONST NO=>
SPEC NO => 280105 -30        DESIGN NO => P1255AT1A1
INFL =>    26.0  PSI         LOAD => 2028.0   LBS.              RIM =>  7.00
INFL =>    179  KPA          LOAD =>  9020.0  NWT               NO. OF TIRES =>   1
BREAKIN =>VARIES             FOR=>10  MIN           AMBIENT TEMP=>100F+-5 F
TIRE DESCRIPTION => FIRESTONE WILDERNESS AT
GENERAL FEATURES => FIRESTONE WILDERNESS AT
USE DASH NO =>
SOURCE => TRA                GOAL/MAX SPEED => 106.00
REMARKS => '80105J' WRITTEN ON SOWL             AYO 7-7-00
                                                   240 454 BV     PRIORITY
CUSTOMER => FORD             WHEEL MATERIAL=>  W2HC 1/9 2/00
==========================================================================
REQUESTOR:TS0TDS4                 ENGINEER: QUEISER              PHONE: 6622
MACHINE:____13____           STATION:__3___
DISPOSITION: INSP. RACKS
END REMARKS: ______________________________________________________
DATE COMPLETE  YR ____- MO __ -DA __        OPERATOR_______________
==========================================================================
```

STEP NO	LOAD LB	LOAD NWT	INFL PSI	INFL KPA	STEP SPEED	CAP/ REG	STEP DUR	DUR UNIT	STEP REF LOAD	STEP REF INFL
1	1500	6670	26.0	179.2	14.00		2.00	MIN	2028	26.0
2	1500	6670	26.0	179.2	27.00		2.00	MIN	2028	26.0
3	1500	6670	26.0	179.2	41.00		2.00	MIN	2028	26.0
4	1500	6670	26.0	179.2	54.00		2.00	MIN	2028	26.0
5	1500	6670	26.0	179.2	67.00		2.00	MIN	2028	26.0
6	1500	6670	26.0	179.2	81.00		10.00	MIN	2028	26.0
7	1500	6670	26.0	179.2	87.00		10.00	MIN	2028	26.0
8	1500	6670	26.0	179.2	94.00		10.00	MIN	2028	26.0
9	1500	6670	26.0	179.2	100.00		10.00	MIN	2028	26.0
10	1500	6670	26.0	179.2	106.00		10.00	MIN	2028	26.0
11	1500	6670	26.0	179.2	112.00		10.00	MIN	2028	26.0
12	1500	6670	26.0	179.2	118.00		10.00	MIN	2028	26.0
13	1500	6670	26.0	179.2	125.00		10.00	MIN	2028	26.0
14	1500	6670	26.0	179.2	131.00		10.00	MIN	2028	26.0
15	1500	6670	26.0	179.2	137.00		10.00	MIN	2028	26.0
16	1500	6670	26.0	179.2	143.00		10.00	MIN	2028	26.0
17	1500	6670	26.0	179.2	149.00		10.00	MIN	2028	26.0
18	1500	6670	26.0	179.2	156.00		10.00	MIN	2028	26.0
19	1500	6670	26.0	179.2	162.00		10.00	MIN	2028	26.0
20	1500	6670	26.0	179.2	168.00		10.00	MIN	2028	26.0

CLOCK TIME	DATE	ON OR OFF	OPER.	DRUM COUNTER	MILEAGE	DRUM R.P.M.	DRUM M.P.H.	LOAD	INFL.	R.T.	TOTAL ~~HOURS~~ min	
4^{19}A	7 8	ON	BB	BC	0		14	1500	26	100	0	
5^{26}A	7 8	OFF	BB	BC	96.7		112	1500	31	101	66.40	
				6.37	Min	@	112	MPH				
				OSS Wall Sep								
					31 PSI							

POS.	SECTION NEW PSI		ARC NEW PSI		CHORD NEW PSI	
1						
2						
3						
4						
5						
6						
AVG.						

CUT GROWTH MEASUREMENTS

POS.	GROOVES - SS TO OSS 1	2	3	4		
1						
2						
3						
4						

SERIAL SIZE MACHINE T3 STATION 3 TEST NO.

TEST PROJ.

049-01021 3-85

```
       TEST DATE:  07/08/2000
  PROJECT NUMBER:  141FM001
     TEST NUMBER:  J45530
       TEST CODE:  U5
     SPEC NUMBER:  280105
     DASH NUMBER:  30
    D.O.T. NUMBER:  W2HLIPY2100
        ENGINEER:  QUEISER
       TIRE SIZE:  P235/75R15
        RIM SIZE:  7.00
TIRE DESCRIPTION:  WILD.AT
DESIGN LOAD(LBS):  1500
 TEST INFL.(PSI):  26
     MACHINE I.D.:  T3
  STATION NUMBER:  3
   TEST OPERATOR:  BILL G.

       TEST CODE:  U5

      START TIME:  04:19:50
       STOP TIME:  05:26:14

STATION 3 TOTAL ELAPSED TEST TIME:   66.40  minutes

STEP    STEP             STATION 3             STEP     TOTAL
 NO.  START TIME *****STEP ELAPSED TIME*****  MILEAGE  MILEAGE  LOAD   TEMP
  1    04:19:50    2.00 Minutes(s) @ 14.3 MPH    0.5      0.5   1503   97.9
  2    04:21:50    2.00 Minutes(s) @ 27.3 MPH    0.9      1.4   1498   97.7
  3    04:23:50    2.00 Minutes(s) @ 40.9 MPH    1.4      2.7   1501   98.0
  4    04:25:50    2.00 Minutes(s) @ 54.2 MPH    1.8      4.5   1498   98.1
  5    04:27:50    2.00 Minutes(s) @ 67.3 MPH    2.2      6.8   1498   98.6
  6    04:29:50   10.00 Minutes(s) @ 81.1 MPH   13.5     20.3   1497   97.2
  7    04:39:51   10.00 Minutes(s) @ 87.0 MPH   14.5     34.8   1504  100.1
  8    04:49:51   10.00 Minutes(s) @ 93.9 MPH   15.7     50.4   1496  101.0
  9    04:59:51   10.00 Minutes(s) @ 99.7 MPH   16.7     67.1   1504  100.7
 10    05:09:52   10.00 Minutes(s) @105.9 MPH   17.7     84.8   1500   92.8
 11    05:19:52    6.37 Minutes(s) @112.0 MPH   11.9     96.7   1500  101.5
```

OSS WALL SEP
31 PSI

FIELD REVIEW COMMITTEE

To:

Secretary, FRC
Suite 785
Diagnostic Service Center II
Ford Customer Service Division – North America

The attached Evaluation Paper is being forwarded for review by the Field Review Committee. Copies have been submitted for review to:

Office of the General Counsel: YES ☐ NO ☐

Vehicle Environmental Engineering: YES ☐ NO ☐

Automotive Safety Office: YES ☐ NO ☐

VC Purchasing Director: YES ☐ NO ☐

Subject: Firestone Wilderness AT tire / Venezuela/Colombia/Ecuador – loss of tire tread.

Concur: ____________________
Vehicle Line Director

____
Date

Concur: ____________________
Vehicle Center Engineering Director

____
Date

Concur: ____________________
FCSD Vehicle & Service Programs Director

____
Date

Approve: ____________________
Vice Center Vice President

____
Date

Approve: ____________________
FSCD Vice President

____
Date

1. PROBLEM DESCRIPTION

A. While driving a vehicle, the tire tread may get separated (belt edge separation) from the main carcass of the tire. Some tires throw the tread but remain inflated. Customers report that they heard a sound similar to an "explosion". The tire failure is discovered when the driver hears the tire tread hitting the wheel housing under the fender. Some rollovers have been attributed to tire separation by the media. As of 05 16 00, 50 alleged accidents attributed to tire tread separation. Tires involved show high mileage (from 80.000 km to 160.000 Km). Vehicles involved have been '96, '97, '98 and '99 MY. FOV have reports of incidents involving both tires, locally manufactured and USA manufactured. Venezuela, Colombia and Ecuador have unique customer usage patterns and conditions as compared to other markets.

B. Firestone P255/70R16 Wilderness AT 109S Tire:
Engineering part #: F57A1508-JA (Black letters)
F85A1508N -1A (White letters)
P235/75 R15 Wilderness AT 109S Tire:
Engineering part #: 987K1508-BA (Black letters)
987k1508- AA (White letters)

Service part: P255/70R16 Wilderness AT Tire (Black letters)
P255/70R16 Wilderness AT Tire (White letters)
P235/75 R15 Wilderness AT Tire (Black letters)
P235/75 R15 Wilderness AT Tire (White letters

C. Vehicles Affected:

- **Part name: P255/70R16 Wilderness AT 109S:** Explorer 4x4 and F-150
  P235/75 R15 Wilderness AT 109S: Explorer 4x2

Model Year(s)	Vehicle Line	Vehicle volume	Variants	Other Limiting Factors
1996	Explorer	1,680	4x4, Manual, Automatic, 4.0L.	255/70 R16 AT
1997	Explorer	9,031	4x4, Manual, Automatic, 4.0L.	"
1998	Explorer	8,543	4x4, Manual, Automatic, 4.0L.	"
1999	Explorer	3,702	4x4, Manual, Automatic, 4.0L.	"
1996	Explorer	505	4x2 Manual, Automatic, 4.0L.	235/75 R15 AT
1997	Explorer	3,137	4x2 Manual, Automatic, 4.0L.	"
1998	Explorer	5,734	4x2 Manual, Automatic, 4.0L.	"
1999	Explorer	2,536	4x2 Manual, Automatic, 4.0L.	"
1998	F-150	2,965	4x4, 4x2, Manual, Automatic.	255/70 R16 AT
1999	F-150	1,491	4x4, 4x2, Manual, Automatic.	"
1998/99	Imported Explorer	488	4x4, 4x2, Manual, Automatic.	255/70 R16 AT

D. Markets Affected: Venezuela. Even though there are few reports to date, FOV will also include in the program Venezuelan F-150 vehicles. and Explorer and F-150 vehicles in the Colombia and Ecuador markets because reputation is being affected.

E. CPSC: 04.04.02

2. DEFINE ROOT CAUSE

The root cause of the tire failures was determined to be tread separation from the tire carcass caused by a combination of the following contributing factors which are unique to customers usage and conditions in Venezuela.

A. Low inflation operating situation – causing internal tire damage resulting in tread separation caused by the following issues.

Improper repair:

Tire repairs being done using unapproved rope type plugs. This type of repairs may leak air, potentially unbeknown to the customer.

Unintentional under-inflation condition (puncture, other leak). Customer gets slow leak from puncture and drives on under-inflated tire.

Valve stem leakage due to customer not replacing cap, resulting in the allowance of external objects getting into the valve.

Continue/ Repeated use while under-inflated

Customers who do not realize that he/she is driving under inflated, may drive at extremely high speeds for prolonged periods of time.

B. Extended / Repeated use at high speed in high ambient temperatures

For the P235/75 R15 and P255/70 R16 (locally sourced) tires are non speed rated, per DOT 571-109 requires 30 min. at 160 KPH, and COVENIN 663-96 to run at a rated speed of 136 KPH for a period of time of 30 min., and 10 min. at 160 KPH before the tire starts to fail internally (under lab testing conditions and specific procedures).

For the P255/70 R16 (North American sourced) tires are "S" speed rated per SAE procedure J1561 to run at rated speed (i.e, 180 KPH) for only a short period of time (10 min steps at 38 psi) before the tire starts to fail internally (under lab testing conditions and specifics procedures). Customers in Venezuela are driving the Explorer and F-150 as fast as 160 KPH –100MPH- for hours, possibly several times a week, possibly every week of the year, for 3-4 years. Running the tires for long periods at high speeds have an accumulative effect on destroying the tire.

C. Extended / Repeated use at overload conditions in high ambient temperatures

We have found customer using the Explorer with eight people (adults and children) inside the truck with additionally luggage and camping equipment. This generate more heat in addition to the high ambient operating conditions and high vehicle speeds. These all ad up to speeding up the destruction to the tire internally.

D. Fatigue failure accelerated by high temperatures

The tire rubber internal bonds start to break down when exposed to high temperatures for extended periods of time. This in conjunction with dynamic cycling (driving at high speeds which imparts additional heat into the rubber) breaks more of these bonds between the rubber molecules and between the rubber and the steel belts. This weakening/breaking of the bonds between the steel belt and the rubber is where the tire tread separation starts and "unzips" the tread. In the operating conditions of the Venezuelan market the carcass of the tire in some cases may not be robust enough to last until the tire tread would indicate the need for tire replacement.

E. Please check the applicable item(s) in each category:

- Type: ☒ Design ☐ Manufacturing ☐ Vehicle Assembly
  ☐ Other (If other, specify _____)
- System: ☐ Body ☐ Chassis ☐ Cooling ☐ Fuel ☐ Electrical
  ☐ Engine ☐ Glass ☐ Restraints ☐ Transmission/Axle
  ☐ Vehicle Label/Publications ☐ Emissions Control
  ☐ OBD ☒ Other (Tires)
- Symptom: ☐ Brake Control ☐ Emission Compliance
  ☐ Other Regulatory Compliance ☒ Driveability / Not Start
  ☐ Engine Speed Control/Unexpected Movement ☐ Fire
  ✓ ☐ Steering Control ☐ Occupant Restraint ☒ Personal Injury
  ☐ Visibility ☐ Warranty Avoidance / Customer Satisfaction
  ☐ Other (If other, specify _______)

3. PROBLEM INVESTIGATION/VERIFICATION DATA

A. Lab tests:

Firestone experts indicated that more samples to be tested at their laboratories were not required.

B. Vehicle tests:

In our (FOV, Firestone) field evaluation a total of 37 Explorer were examined without locating a sample that could reproduce the exact failure. There were damages done to the tires such as: superficial or on the steel belt punctures, under inflated tires, bad repairs, damage on the side walls etc, but not tread separation.

C. Plant / Supplier reports:

Supplier (Bridgestone / Firestone of Venezuela) has been contacted in Venezuela and U.S. about Venezuelan incidents. A team was formed in order to perform a field survey, this team involved Firestone Venezuela/ USA and Ford representatives. The conclusions from Firestone USA are:

.- It was not detected any defect with the tire.

.- Low inflation operating conditions caused by any of the following can cause damage to the tire when it continues to be run with inadequate pressure:

- Punctures, cuts which cause slow leaks and tire continues to be used with low inflation
- Poor tire maintenance
- Improper repairs.

They inspect 56 P255/70 R16 Wilderness AT and 76 P235/75 R15 Wilderness ATX tires.

D. Quality Indicators System: None.

E. **Field reports:** an approximate of 50 from Venezuela. All the reported cases have occurred in Venezuela.

F. **Parts sales:** Service changes are handled through Firestone dealers through Job'1 to March/2000. They are presently handled through Goodyear & Ford dealers.

G. **Number of accidents/fines and injuries:** There have been an estimated of fifty accidents. The Venezuelan media has attributed a number of fatalities and injuries to tire tread separation. We have not confirmed the cause of any of these accidents.

4. ACTIONS TAKEN IN PRODUCTION; INTERIM (CONTAINMENT) AND/OR PERMANENT

Interim corrective actions:

A modified Firestone tire Venezuelan made with a higher speed rating (S), cap-ply reinforcement and polyester materials for construction was developed. The use of the new tire in production was on the 06/15/99 (DOT-259). Additionally, the tire inflation pressure was recommended to be of 30-32 psi as of 5/01/99 (previously set to 26 front – 28 rear psi for FOV vehicles only).

FOV Engineering Department released on September/99 for the 2000 MY Explorers and F-150 a Goodyear Wrangler RTS tire in order to improve our image and customer satisfaction. All the technical requirements and tests were completed successfully.

A. Notification: **Release number:** 98-229-2, 98-228-2, 98-050-6, 96-023-9 of 06/01.99 for the Wilderness Firestone tire.
99-209, 98-122-5, 99-208, 99-001-4 for the Goodyear Wrangler RTS tire on 08/25/99.

B. **WERS alert number:** None.
C. **Component batch issues:** None

5. VERIFY EFFECTIVENESS OF CORRECTIVE ACTIONS

A. The interim corrective tires were bench tested by Firestone at 160 KPH (100 MPH) for a period of four continuos hours without failure.

6. ESTIMATED PRODUCTION AND PROBLEM STATISTICS (MAGNITUDE OF CONCERN) Venezuela/Colombia & Ecuador

VEHICLES AFFECTED	ASSEMBLY PLANTS	VEHICLE PRODUCTION DATES	POTENTIALLY NUMBER OF UNITS	AFFECTED UNITS ESTIMATED PERCENTAGE OF VEHICLES THAT CONTAIN THE CONDITION
Explorer	FOV	Job1 96MY through 99MY	34,868	unknown
F-150	FOV	98 MY through some 99MY	4,456	unknown
BU/ Imported	USA	98 MY through some 99MY	488	unknown

7. AFTERMARKET PARTS

A. The Firestone tire was released on October 1995 until 06/15/99. Ford Motor de Venezuela, S.A. does not stock tires for service. Firestone dealers actual stock is unknown.
B. Currently FOV Dealers are selling Goodyear tires.

Firestone must determine whether they want to purge their inventory of tires at their distributor and tire stores in Venezuela.

8. ASSESMENT OF EFFECT ON VEHICLE OPERATION

In the event that a tire tread separates while the vehicle is travelling at extremely high rates of speed, driver may have reduced or complete loss of steering control.

9. DESCRIPTION OF CONCERN SOLUTION AND PARTS REQUIREMENTS (FIELD SERVICE ACTIONS)

Short term actions:

The Engineering Department released a Goodyear tire in order to improve our image and customer satisfaction. All the technical requirements and tests are completed successfully.
Vehicles sold between job#1 '96 and '98 will be replacing the five (5) tires. Four of them a full size tire and the spare for another Goodyear but R15. On '98 and '99 MY vehicles we will be replacing all five (5) tires because the spare tire is the same size and construction as the four road tires. FOV will not be changing tires on any vehicle that comes in to our Dealers and has had the tires changed from Firestone to some other brand tire.

2000 MY Explorer produced in Venezuela and exported to Colombia and Ecuador are fitted with the Goodyear tires.

Long term actions:

A. No long term prime actions has been assessed yet.
B. Test processes, plant capacity, market wants and other factors will be thoroughly considered in developing a long term action.

10. PROGRAM PARTS SIGN OFF/AVAILABILITY

The Goodyear 255/70 R16 (black letters) part number 985K-1508-AA, 255/70 R16 (white letters) part number 995K-1508-BA, 235/75 R15 (white letter) part number F87A-1508-K3B and 235/75 R15 (black letters) part number 995K-1508-AA was released on 08/24/99. These tires were fully approved and PPAP released on the 10/22/99 and 11/11/99 respectively. No tooling is needed for this part number.
Part availability schedule: In production.

11. SUPPLIER INVOLVEMENT

A. The name of the causal part supplier:

Bridgestone/Firestone Venezolana, C.A.
Carretera Nacional Valencia Los Guayos,
Valencia-Edo. Carabobo.
Venezuela.
Pedro Martinez, Sales Manager for Original parts 011-58-41-407777

B. This condition is component-related, and is specifically related to the tire usage in the Venezuelan market.

C. Percentage of the root cause contributed by the supplied component: TBD.

D. Deliver copy of this paper to tire buyer Martin Cadena when completed and approved.
E. Bridgestone / Firestone: LF177 , Prefit code: 6062
GOODYEAR: LG214, Prefit code: 6066
F. Miguel Ruiz MRUIZ2 (Manager) / Martin Cadena MCADENA (Buyer).

12. FINANCIAL IMPLICATIONS

Explorer	1996 Units	1997 Units	1998 Units	1999 Units	Total
Venezuela	1,094	7,394	10,531	5244	24,263
Colombia	1,091	3,762	2.612	609	8,074
Ecuador	0	1.012	1.134	385	2.531
Total	2,185	12.168	14,277	6,238	34,868

PN 96	1996	1997	1998	1999	Total
Venezuela			2,441	1,325	3,766
Colombia			418	70	488
Ecuador			106	96	202
Explorer Imp.			135	353	488
Total	2.185	*12.168	17.377	8.082	39.812

Estimated Percentage Change 80%		31,850 Veh.
	Metric	
Tires R15	Units	63,451
Tires R16	Units	95,797
Total Tires	**Units**	**159,248**

Tire Cost-R15	US$	52
Tire Cost-R16(Avg Nat./Imp)	US$	65
Total Tire Cost –R15	US$(000)	3.300
Total Tire Cost –R16	US$(000)	6.227
Tire Cost	**US$(000)**	9.527
Mark-Up	US$(000)	1.429
Total Tire Cost	**US$(000)**	**10.956**
Return and Disposal of Used Tires		
Freight & Handling Serteca GY To FOV Dealer and Adm Exp.	US$(000)	372
Freight & Handling FOV Dealer to FOV Plant.	US$(000)	349
Disposal Cost	US$(000)	149
Total Return and Disp.of Used Tires	**US$(000)**	**870**
Administrative, Marketing & Legal Exp.		1,500
TOTAL TIRES	**US$(000)**	**13.326**

Purchasing, Engineering, and other appropriate activities will jointly determine the extent of supplier financial responsibility. If supplier reimbursement is warranted in the field service action, purchasing will negotiate cost recovery.

13. PREVENT ACTIONS

Low inflation operating situation:

.- Firestone and Hayes Wheels performed an instructive field trip all around Ford dealers in order to teach how to evaluate tires conditions, how to inspect a tire reparation, etc.

Extended / repeated use at extremely high speed:

.- Tire SDS, ES, spec and WDMO Regulations to be modified to include the following for all vehicles going to Andina markets:

- Use tire with speed rating at least one (1) level higher than the vehicle max speed when adjusted for vehicle recommended tire pressure. If this tire construction does not exist, then speed limit the vehicle to one speed level (10KPH) below the tires speed capability when adjusted for vehicle recommended tire pressure.
- Tire should have a minimum of a "A" temperature rating by the UTQG system.
- Tire should be of a "special service" construction for extreme puncture resistance.

Overall the tire carcass useful life should be designed to last the useful life of tread wear), as a measured at TWI (tread wear indicator), (i.e. tread should be fuse to indicate when the tire should be changed).

14. REFERENCE DATA

Edivia Caballero, ECABALL1, Service Engineer, 011-58-41-406189, Ford Motor of Venezuela.

FIELD REVIEW COMMITTEE

001344

To:

Secretary, FRC
Suite 785
Diagnostic Service Center II
Ford Customer Service Division – North America

The attached Evaluation Paper is being forwarded for review by the Field Review Committee. Copies have been submitted for review to:

Office of the General Counsel: YES ☐ NO ☐

Vehicle Environmental Engineering: YES ☐ NO ☐

Automotive Safety Office: YES ☐ NO ☐

VC Purchasing Director YES ☐ NO ☐

Subject: Firestone Wilderness AT tire / Venezuela/Colombia/Ecuador – loss of tire tread

Concur ____________________
Vehicle Line Director
____
Date

Concur ____________________
Vehicle Center Engineering Director
____
Date

Concur ____________________
FCSD Vehicle & Service Programs Director
____
Date

Approve ____________________
Vice Center Vice President
____
Date

Approve ____________________
FSCD Vice President
____
Date

1. PROBLEM DESCRIPTION

A. While driving a vehicle, the tire tread may get separated (belt edge separation) from the main carcass of the tire. Some tires throw the tread but remain inflated. Customers report that they heard a sound similar to an "explosion". The tire failure is discovered when the driver hears the tire tread hitting the wheel housing under the fender. Some rollovers have been attributed to tire separation by the media. As of 05/16/00, 50 alleged accidents attributed to tire tread separation. Tires involved show high mileage (from 80.000 km to 160.000 Km). Vehicles involved have been '96, '97, '98 and '99 MY. FOV have reports of incidents involving both tires, locally manufactured and USA manufactured. Venezuela, Colombia and Ecuador have unique customer usage patterns and conditions as compared to other markets.

B. Firestone P255/70R16 Wilderness AT 109S Tire:

Engineering part #	F57A1508-JA	(Black letters)
	F85A1508N -1A	(White letters)

P235/75 R15 Wilderness AT 109S Tire:

Engineering part #	987K1508-BA	(Black letters)
	987k1508- AA	(White letters)

Service part:	P255/70R16 Wilderness AT Tire	(Black letters)
	P255/70R16 Wilderness AT Tire	(White letters)
	P235/75 R15 Wilderness AT Tire	(Black letters)
	P235/75 R15 Wilderness AT Tire	(White letters

C. **Vehicles Affected:**

- **Part name: P255/70R16 Wilderness AT 109S:** Explorer 4x4 and F-150
  P235/75 R15 Wilderness AT 109S: Explorer 4x2

Model Year(s)	Vehicle Line	Vehicle volume	Variants	Other Limiting Factors
1996	Explorer	1,680	4x4, Manual, Automatic, 4.0L	255/70 R16 AT
1997	Explorer	9,049	4x4, Manual, Automatic, 4.0L	"
1998	Explorer	11,089	4x4, Manual, Automatic, 4.0L	"
1999	Explorer	4,299	4x4, Manual, Automatic, 4.0L	"
1996	Explorer	505	4x2 Manual, Automatic, 4.0L	235/75 R15 AT
1997	Explorer	3,137	4x2 Manual, Automatic, 4.0L	"
1998	Explorer	5,734	4x2 Manual, Automatic, 4.0L	"
1999	Explorer	2,536	4x2 Manual, Automatic, 4.0L	"
1998	F-150	3,893	4x4, 4x2, Manual, Automatic	255/70 R16 AT
1999	F-150	1,491	4x4, 4x2, Manual, Automatic	"

1998/99	Imported Explorer	488	4x4, 4x2, Manual, Automatic.	255/70 R16 AT

D. Markets Affected: Venezuela. Even though there are few reports to date, FOV will also include in the program Venezuelan F-150 vehicles, and Explorer and F-150 vehicles in the Colombia and Ecuador markets because reputation is being affected.

E. CPSC: 04.04.02

2. DEFINE ROOT CAUSE

The root cause of the tire failures was determined to be tread separation from the tire carcass caused by a combination of the following contributing factors which are unique to customers usage and conditions in Venezuela.

A. Low inflation operating situation – causing internal tire damage resulting in tread separation caused by the following issues.

Improper repair:

Tire repairs being done using unapproved rope type plugs. This type of repairs may leak air, potentially unbeknown to the customer.

Unintentional under-inflation condition (puncture, other leak). Customer gets slow leak from puncture and drives on under-inflated tire.

Valve stem leakage due to customer not replacing cap, resulting in the allowance of external objects getting into the valve.

Continue/ Repeated use while under-inflated

Customers who do not realize that he/she is driving under inflated, may drive at extremely high speeds for prolonged periods of time.

B. Extended / Repeated use at high speed in high ambient temperatures

For the P235/75 R15 and P255/70 R16 (locally sourced) tires are non speed rated, per DOT 571-109 requires 30 min at 160 KPH, and COVENIN 663-96 to run at a rated speed of 136 KPH for a period of time of 30 min., and 10 min. at 160 KPH before the tire starts to fail internally (under lab testing conditions and specific procedures).

For the P255/70 R16 (North American sourced) tires are "S" speed rated per SAE procedure J1561 to run at rated speed (i.e, 180 KPH) for only a short period of time (10 min steps at 38 psi) before the tire starts to fail internally (under lab testing conditions and specifics procedures). Customers in Venezuela are driving the Explorer and F-150 as fast as 160 KPH –100MPH- for hours, possibly several times a week, possibly every week of the year, for 3-4 years Running the tires for long periods at high speeds have an accumulative effect on destroying the tire

C. Extended / Repeated use at overload conditions in high ambient temperatures
We have found customer using the Explorer with eight people (adults and children) inside the truck with additionally luggages and camping equipment. This generate more heat in addition to the high ambient operating conditions and high vehicle speeds. These all ad up to speeding up the destruction to the tire internally.
Also the tread separation has a tendency to occur on the rear tire, with an estimated factor of 64% of the accidents.

D. Fatigue failure accelerated by high temperatures
The tire rubber internal bonds start to break down when exposed to high temperatures for extended periods of time. This in conjunction with dynamic cycling (driving at high speeds which imparts additional heat into the rubber) breaks more of these bonds between the rubber molecules and between the rubber and the steel belts. This weakening/breaking of the bonds between the steel belt and the rubber is where the tire tread separation starts and "unzips" the tread. In the operating conditions of the Venezuelan market the carcass of the tire in some cases may not be robust enough to last until the tire tread would indicate the need for tire replacement.

E. Please check the applicable item(s) in each category:

- Type: ✓☐ Design ☐ Manufacturing ☐ Vehicle Assembly
  ☐ Other (If other, specify _____)

- System: ☐ Body ☐ Chassis ☐ Cooling ☐ Fuel ☐ Electrical
  ☐ Engine ☐ Glass ☐ Restraints ☐ Transmission/Axle
  ☐ Vehicle Label/Publications ☐ Emissions Control
  ☐OBD ☐✓ Other (Tires)

- Symptom: ☐ Brake Control ☐ Emission Compliance
  ☐ Other Regulatory Compliance ✓☐ Driveability / Not Start
  ☐ Engine Speed Control/Unexpected Movement ☐ Fire
  ✓ ☐ Steering Control ☐ Occupant Restraint ☐✓ Personal Injury
  ☐ Visibility ☐ Warranty Avoidance / Customer Satisfaction
  ☐ Other (If other, specify _______)

3. PROBLEM INVESTIGATION/VERIFICATION DATA

A. Lab tests:

Firestone experts indicated that more samples to be tested at their laboratories were not required.

B. Vehicle tests:

In our (FOV, Firestone) field evaluation a total of 37 Explorer were examined without locating a sample that could reproduce the exact failure There were damages done to the tires such as: superficial or on the steel belt punctures, under inflated tires, bad repairs, damage on the side walls etc, but not tread separation.

C. Plant / Supplier reports:

Supplier (Bridgestone / Firestone of Venezuela) has been contacted in Venezuela and U.S. about Venezuelan incidents. A team was formed in order to perform a field survey, this team involved Firestone Venezuela/ USA and Ford representatives. The conclusions from Firestone USA are:

- It was not detected any defect with the tire.
- Low inflation operating conditions caused by any of the following can cause damage to the tire when it continues to be run with inadequate pressure:

- Punctures, cuts which cause slow leaks and tire continues to be used with low inflation
- Poor tire maintenance
- Improper repairs.

They inspect 56 P255/70 R16 Wilderness AT and 76 P235/75 R15 Wilderness ATX tires.

D Quality Indicators System: None.

E Field reports an approximate of 50 from Venezuela. All the reported cases have occurred in Venezuela

F Parts sales Service changes are handled through Firestone dealers through Job'1 to March/2000. They are presently handled through Goodyear & Ford dealers.

G. Number of accidents/fines and injuries There have been an estimated of fifty accidents. The Venezuelan media has attributed a number of fatalities and injuries to tire tread separation. We have not confirmed the cause of any of these accidents.

4. ACTIONS TAKEN IN PRODUCTION: INTERIM (CONTAINMENT) AND/OR PERMANENT

Interim corrective actions:

A modified Firestone tire Venezuelan made with a higher speed rating (S). cap-ply reinforcement and polyester materials for construction was developed. The use of the new tire in production was on the 06/15/99 (DOT-259). Additionally, the tire

inflation pressure was recommended to be of 30-32 psi as of 5/01/99 (previously set to 26 front – 28 rear psi for FOV vehicles only).

FOV Engineering Department released on September/99 for the 2000 MY Explorers and F-150 a Goodyear Wrangler RTS tire in order to improve our image and customer satisfaction All the technical requirements and tests were completed successfully.

A. Notification: **Release number:** 98-229-2, 98-228-2, 98-050-6, 96-023-9 of 06/01/99 for the Wilderness Firestone tire.
99-209, 98-122-5, 99-208, 99-001-4 for the Goodyear Wrangler RTS tire on 08/25/99.

B. WERS alert number: None.
C. Component batch issues: None

5. VERIFY EFFECTIVENESS OF CORRECTIVE ACTIONS

A The interim corrective tires were bench tested by Firestone at 160 KPH (100 MPH) for a period of four continuos hours without failure.

6. ESTIMATED PRODUCTION AND PROBLEM STATISTICS (MAGNITUDE OF CONCERN) Venezuela/Colombia & Ecuador

VEHICLES AFFECTED	ASSEMBLY PLANTS	VEHICLE PRODUCTION DATES	POTENTIALLY NUMBER OF UNITS	AFFECTED UNITS ESTIMATED PERCENTAGE OF VEHICLES THAT CONTAIN THE CONDITION
Explorer	FOV	Job1 96MY through 99MY	38.029	unknown
F-150	FOV	98 MY through some 99MY	5.384	unknown
BU/ Imported	USA	98 MY through some 99MY	488	unknown

7. AFTERMARKET PARTS

A The Firestone tire was released on October 1995 until 06/15/99. Ford Motor de Venezuela, S.A. does not stock tires for service Firestone dealers actual stock is unknown.

B Currently FOV Dealers are selling Goodyear tires

Firestone must determine whether they want to purge their inventory of tires at their distributor and tire stores in Venezuela

8. ASSESMENT OF EFFECT ON VEHICLE OPERATION

In the event that a tire tread separates while the vehicle is travelling at extremely high rates of speed, driver may have reduced or complete loss of steering control

9. DESCRIPTION OF CONCERN SOLUTION AND PARTS REQUIREMENTS (FIELD SERVICE ACTIONS)

Short term actions:

The Engineering Department released a Goodyear tire in order to improve our image and customer satisfaction. All the technical requirements and tests are completed successfully.
Vehicles sold between job#1 '96 and '98 will be replacing the five (5) tires. Four of them a full size tire and the spare for another Goodyear but R15. On '98 and '99 MY vehicles we will be replacing all five (5) tires because the spare tire is the same size and construction as the four road tires. FOV will not be changing tires on any vehicle that comes in to our Dealers and has had the tires changed from Firestone to some other brand tire.

2000 MY Explorer produced in Venezuela and exported to Colombia and Ecuador are fitted with the Goodyear tires.

Long term actions:

A No long term prime actions has been assessed yet.
B Test processes, plant capacity, market wants and other factors will be thoroughly considered in developing a long term action.

10. PROGRAM PARTS SIGN OFF/AVAILABILITY

The Goodyear 255/70 R16 (black letters) part number 985K-1508-AA, 255/70 R16 (white letters) part number 995K-1508-BA, 235/75 R15 (white letter) part number F87A-1508-K3B and 235/75 R15 (black letters) part number 995K-1508-AA was released on 08/24/99. These tires were fully approved and PPAP released on the 10/22/99 and 11/11/99 respectively. No tooling is needed for this part number.
Part availability schedule: In production.

11. SUPPLIER INVOLVEMENT

A The name of the causal part supplier:
Bridgestone/Firestone Venezolana, C.A
Carretera Nacional Valencia Los Guayos,
Valencia-Edo. Carabobo
Venezuela.
Pedro Martinez, Sales Manager for Original parts 011-58-41-407777

B This condition is component-related, and is specifically related to the tire usage in the Venezuelan market

C Percentage of the root cause contributed by the supplied component: TBD

D Deliver copy of this paper to tire buyer Martin Cadena when completed and approved.
E. Bridgestone / Firestone: LF177 , Prefit code: 6062
GOODYEAR: .LG214, Prefit code: 6066
F. Miguel Ruiz MRUIZ2 (Manager) / Martin Cadena MCADENA (Buyer).

12. FINANCIAL IMPLICATIONS

Explorer	1996	1997	1998	1999	Total
	Units	Units	Units	Units	
Venezuela	1,094	7,394	10,531	5244	24,263
Colombia	1,091	3,780	5,158	1,206	11,235
Ecuador	0	1,012	1,134	385	2,531
Total	2,185	12,186	16,823	6,835	38,029

PN 96	1996	1997	1998	1999	Total
Venezuela			2,971	1,325	4,296
Colombia			815	70	885
Ecuador			106	96	202
Explorer Imp			135	353	488
Total	2,185	12,186	20,850	8,679	43,900

Estimated Percentage Change 80%	35,120
Cost per Unit (Tires)	$ 302
Total Tires Cost $(Mils)	**$ 9,6**
Administrative, Marketing and Legal Cost (Mils)	**$ 1,5**
Old Tires Transportation and Scrap (Mils)	**TBD**

Purchasing, Engineering, and other appropriate activities will jointly determine the extent of supplier financial responsibility If supplier reimbursement is warranted in the field service action, purchasing will negotiate cost recovery.

13. PREVENT ACTIONS

Low inflation operating situation:

- Firestone and Hayes Wheels performed an instructive field trip all around Ford dealers in order to teach how to evaluate tires conditions. how to inspect a tire reparation, etc

Extended / repeated use at extremely high speed:

- Tire SDS, ES, spec and WDMO Regulations to be modified to include the following for all vehicles going to Andina markets:
    - Use tire with speed rating at least one (1) level higher than the vehicle max speed when adjusted for vehicle recommended tire pressure. If this tire construction does not exist, then speed limit the vehicle to one speed level (10KPH) below the tires speed capability when adjusted for vehicle recommended tire pressure.
    - Tire should have a minimum of a "A" temperature rating by the UTQG system.
    - Tire should be of a "special service" construction for extreme puncture resistance.

Overall the tire carcass useful life should be designed to last the useful life of tread wear), as a measured at TWI (tread wear indicator), (i.e. tread should be fuse to indicate when the tire should be changed).

14. REFERENCE DATA

Edivia Caballero, ECABALL1, Service Engineer, 011-58-41-406189, Ford Motor of Venezuela.

1. PROBLEM DESCRIPTION (what/when/extent)

A. While driving vehicle, the tire tread separated (belt edge separation) from the main carcass of the tire. The tire failure is discovered when the driver hears the tire tread hitting the wheel house or the tire goes flat.

Incidences caused by tire tread separation:

13 incidences caused by tire tread separation have been reported in Malaysia (6) and Thailand (7) combined.

- These failures have been on '97 vehicles, all at mileages between 16,500 km and 55,500 km (10,250 - 34,500 miles).
- 2 of the 13 incidences were caused by punctures or severe tread cut around complete tire.
- There have been 2 reported accidents or rollovers associated with these 13 incidences of tread separation.

B. Firestone P235/75R15 A/T ROWL tire, part # F77A-1508-MA, construction code ST381J, date codes on tires built between 12/25/96 and 2/7/97for Malaysia vehicles and between 1/21/97 and 4/7/97 for Thailand vehicles. This tire size and construction is the standard size tire on exported Explorer's to Malaysia and Thailand.

C. Vehicles Affected:

Model Year (s)	Vehicle Lines	Vehicle Volume	Variants	Other Limiting Factors
Malaysia 1997	Explorer	109	4X4, 4 dr, 4.0L, Auto	P235/75R15 A/T ROWL tire
Thailand 1997	Explorer	277 386	4X4, 4 dr, 4.0L, Auto	P235/75R15 A/T ROWL tire

D. Markets Affected: Malaysia and Thailand.

E. CPSC Codes: 04.04.02.

2. DEFINE ROOT CAUSE

The root cause of the tire failures that were examined was tread separation from the tire carcass caused by a combination of the following contributing factors, some of which are unique to this areas environmental conditions.

A. Fatigue failure accelerated by high temperatures

- Long exposure to elevated temperatures reduce the tear strength of the rubber between the top and bottom steel belts of the tire. This in conjunction with dynamic cycling (driving at high speeds) (which imparts additional heat into the rubber) and cornering causes more of this tearing between the 2 steel belt layers. This weakening/tearing of the rubber between the steel belt and the rubber is where the tire tread separation starts and "unzips" the tread.
    - Some of these vehicles sat in dealer lots for 6 months to as long as 19 months in this high ambient environment. Add to this high ambient temperature the parking lot temperatures after being exposed to sun loads for many hours.

B. Low rolling resistance tires

It is not recommended, by any of our tire suppliers, to send our NAO designed low rolling resistance tires into these export markets that have extremely high ambient conditions, high driving speeds for extended periods, extremely poor road conditions, and overloading of vehicles with excess weight.

C. Extended / Repeated use at overloaded conditions in high ambient temperatures

SUV's in Asia Markets are repeatedly overloaded, as if they were pick-up trucks. This condition generates more heat in the tire, in addition to the high ambient operating conditions and possible high vehicle speeds.

D. Low inflation operating situation - causing internal tire damage resulting in tread separation caused by the following issues.

Unintentional under-inflation condition (puncture, other leak). Customer gets slow leak from puncture and drives on under-inflated tire and/or valve stem leakage due to customer not replacing cap. Low inflation exacerbates the potential for overheating.

E. Extended / Repeated use at extremely high speed in high ambient temperatures

Tires are speed rated per SAE procedure J1561 to run at rated speed (ie, 112 mph). Running the tires at high speeds have an accumulative effect on the tire separating at the interface between the 2 steel belt plies internally. The customers in Thailand and Malaysia can drive from Kuala Lumpur to Singapore for 3 hours at 106 mph.

1997 Explorer P235/75R15 Tire Separation in Malaysia and Thailand

Draft of 2/11/2000

GUIDELINES FOR PREPARING FIELD SERVICE ACTION EVALUATION PAPER

The accompanying document is designed to assist with the preparation of Field Service Action Evaluation Papers. The Field Service Action Evaluation Paper (14d draft paper) is part of the Global Recall Process and it is the method by which the Field Review Committee reviews product concerns which may result in the recall of vehicles or in other forms of retrospective field service action. It is used for all potential field service actions, regardless of whether the concern relates to vehicle safety or not (emission, safety or customer satisfaction concern).

This paper comprises fourteen numbered subject headings (see 14d lead activity list). Within each subject heading, the writer of the paper is expected to answer all the questions listed, seeking input from other activities as appropriate. Comprehensive answers to all these questions are required in order for the Field Review Committee to fully understand the concern under review.

This paper will normally be drafted by the appropriate lead engineering activity acting on behalf of the Vehicle Line Director (In North America Emissions papers are typically drafted by the VEE). Provide the VC Critical Concern Co-ordinator with the latest draft of the 14D whenever it is updated (except Emissions). After the draft paper is completed, it must be reviewed by the Office of General Counsel and, as appropriate, Vehicle Environmental Engineering and/or Automotive Safety Office and/or the VC Purchasing Director.

The draft paper must be concurred (signed transmittal) by the appropriate Vehicle Line Director or his designate and the Vehicle Center Engineering Director before it will be accepted for review by the Field Review Committee.

The concurred draft Evaluation Paper should be sent to:

Recall and Service Programs, Ford Customer Service Division:

EUROPE:	Room GB-1/329 (submit electronically)
NORTH AMERICA:	DSC II, Suite 785

Any questions about this process or about the Field Review Committee meeting schedule should be directed to the affected VC Critical Concern Co-ordinator or the Ford Customer Service Division's Recall and Service Program Department:

- Europe: At the above office; telephone numbers 8734-2049 and 3336 respectively.
- North America: At the above office; telephone numbers 248-8817 and 337-2487.

1997 Explorer P235/75R15 Tire Separation in Malaysia and Thailand

Draft of 2/11/2000

14D LEAD ACTIVITY LIST

ACTION	14 D STEP	ITEM	LEAD ACTIVITY
1	Program Description	A-E	See note @ below
2	Define Root Cause	A-D	See note @ below
3	Problem Investigation/Verification Data	A-B, D-F, G	See note @ below
3		C	See note @ below, Vehicle Operations
4	Actions Taken in Production; Interim (Containment) and/ or Permanent	A-D	See note @ below
5	Verify Effectiveness of Corrective Actions	A-B	See note @ below
6	Estimated Production and Problem Statistics	A-B	See note @ below
7	Aftermarket Parts	A-B	See note @ below, FCSD PS&L
8	Assessment of Effect on Vehicle Operation		See note @ below
9	Description of Concern and Parts Requirements	A-E	See note @ below, FCSD
10	Program Parts Sign Off Availability		FCSD PS&L
11	Supplier Involvement	A-G	See note @ below, STA
12	Financial Implications		See note @ below, FCSD
13	Prevent Actions	A-C	See note @ below
14	Reference Data	A-B	See note @ below

Note:

@ Lead responsibility will be determined by the Engineering Director, Vehicle Line Director, or Critical Concern Co-ordinator.

1997 Explorer P235/75R15 Tire Separation in Malaysia and Thailand

Draft of 2/11/2000

FIELD SERVICE ACTION EVALUATION PAPER (14D) TRANSMITTAL

FIELD REVIEW COMMITTEE

To: (North America)
Secretary, FRC
Suite 785
Diagnostic Service Center II
Ford Customer Service Division — North America

To: (Europe)
Secretary, FRC
Room GB-1/329,
Ford Customer Service Division — Europe

The attached Evaluation Paper is being forwarded for review by the Field Review Committee. Copies have been submitted for review to:

Office of the General Counsel: YES ☐ NO ☐

Vehicle Environmental Engineering: YES ☐ NO ☐

Automotive Safety Office: YES ☐ NO ☐

VC Purchasing Director YES ☐ NO ☐

Subject: **1997 Explorer P235/75R15 Tire Separation in Malaysia and Thailand**

Approve: D. D. Claudepierre
Vehicle Line Director

Date

Approve: T. D. Baughman
Vehicle Center Engineering Director

Date

Approve: A. O'Neill
FCSD Vehicle & Service Programs Director

Date

Note: Both Vehicle Line Director and VC Engineering Director signatures are required prior to Review by the Field Review Committee.

1997 Explorer P235/75R15 Tire Separation in Malaysia and Thailand

Draft of 2/11/2000

FIELD SERVICE ACTION EVALUATION PAPER (14D) TRANSMITTAL

FIELD REVIEW COMMITTEE

To: (North America)
Secretary, FRC
Suite 785
Diagnostic Service Center II
Ford Customer Service Division — North America

To: (Europe)
Secretary, FRC
Room GB-1/329,
Ford Customer Service Division — Europe

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Vehicle Environmental Engineering:	YES ☐	NO ☐
Automotive Safety Office:	YES ☐	NO ☐
VC Purchasing Director	YES ☐	NO ☐

Subject: **1997 Explorer P235/75R15 Tire Separation in Malaysia and Thailand**

Concur: D. D. Claudepierre
Vehicle Line Director
Date

Concur: T. D. Baughman
Vehicle Center Engineering Director
Date

Concur: A. O'Neill
FCSD Vehicle & Service Programs Director
Date

Approve: G. Bedi
Vehicle Center Vice President
Date

Approve: R. Goldsberry
FCSD Vice President
Date

Note: Vehicle Line Director and VC Engineering Director signatures are required prior to Review by the FRC

1997 Explorer P235/75R15 Tire Separation in Malaysia and Thailand

Draft of 2/11/2000

1. **PROBLEM DESCRIPTION** (what/when/extent)

A. While driving vehicle, the tire tread separated (belt edge separation) from the main carcass of the tire. The tire failure is discovered when the driver hears the tire tread hitting the wheel house or the tire goes flat.

Incidences caused by tire tread separation:

13 incidences caused by tire tread separation have been reported in Malaysia (6) and Thailand (7) combined.

- These failures have been on '97 vehicles, all at mileages between 16,500 km and 55,500 km (10,250 - 34,500 miles).
- 2 of the 13 incidences were caused by punctures or severe tread cut around complete tire.
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B. Firestone P235/75R15 A/T ROWL tire, part # F77A-1508-MA, construction code ST381J, date codes on tires built between 12/25/96 and 2/7/97for Malaysia vehicles and between 1/21/97 and 4/7/97 for Thailand vehicles. This tire size and construction is the standard size tire on exported Explorer's to Malaysia and Thailand.

C. Vehicles Affected:

Model Year (s)	Vehicle Lines	Vehicle Volume	Variants	Other Limiting Factors
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Thailand 1997	Explorer	207 316	4X4, 4 dr, 4.0L, Auto	P235/75R15 A/T ROWL tire

D. Markets Affected: Malaysia and Thailand.

E. CPSC Codes: 04.04.02.

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The root cause of the tire failures that were examined was tread separation from the tire carcass caused by a combination of the following contributing factors, some of which are unique to this areas environmental conditions.

A. Fatigue failure accelerated by high temperatures

Long exposure to elevated temperatures reduce the tear strength of the rubber between the top and bottom steel belts of the tire. This in conjunction with dynamic cycling (driving at high speeds) (which imparts additional heat into the rubber) and cornering causes more of this tearing between the 2 steel belt layers. This weakening/tearing of the rubber between the steel belt and the rubber is where the tire tread separation starts and "unzips" the tread.

- Some of these vehicles sat in dealer lots for 6 months to as long as 19 months in this high ambient environment. Add to this high ambient temperature the parking lot temperatures after being exposed to sun loads for many hours.

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It is not recommended, by any of our tire suppliers, to send our NAO designed low rolling resistance tires into these export markets that have extremely high ambient conditions, high driving speeds for extended periods, extremely poor road conditions, and overloading of vehicles with excess weight.

C. Extended / Repeated use at overloaded conditions in high ambient temperatures

SUV's in Asia Markets are repeatedly overloaded, as if they were pick-up trucks. This condition generates more heat in the tire, in addition to the high ambient operating conditions and possible high vehicle speeds.

D. Low inflation operating situation - causing internal tire damage resulting in tread separation caused by the following issues.

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E. Extended / Repeated use at extremely high speed in high ambient temperatures

Tires are speed rated per SAE procedure J1561 to run at rated speed (ie, 112 mph). Running the tires at high speeds have an accumulative effect on the tire separating at the interface between the 2 steel belt plies internally. The customers in Thailand and Malaysia can drive from Kuala Lumpur to Singapore for 3 hours at 106 mph.

F. Fatigue failure accelerated by ozone exposure

The high ozone levels caused by smoke (burning of forests) chemically attacks the rubber and breaks down the bonds linking the rubber molecules. We see this condition on the outer upper sidewall and shoulder area of the tires as cracks. These cracks can cause tread separation or sidewall bulges.

F. Please check the applicable item(s) in each category:

- Type: X Design ☐ Manufacturing ☐ Vehicle Assembly
  X Other (Specify - Customer - air pressure or Road Hazard -Puncture)
- System: ☐ Body X Chassis ☐ Cooling ☐ Fuel ☐ Electrical ☐ Engine
  ☐ Glass ☐ Restraints ☐ Transmission/Axle
  ☐ Vehicle Label/Publications ☐ Emissions Control
  ☐ OBD ☐ Other
- Symptom: ☐ Brake Control ☐ Emission Compliance
  ☐ Other Regulatory Compliance ☐ Driveability/No Start
  ☐ Engine Speed Control/Unexpected Movement ☐ Fire
  X Steering Control ☐ Occupant Restraint
  ☐ Visibility

3. PROBLEM INVESTIGATION/VERIFICATION DATA

A. Lab tests - None

B. Vehicle tests - None

C. Plant/supplier reports - Supplier (Bridgestone/Firestone) has been contacted in Japan and U.S. on Malaysia and Thailand incidents. Ford Explorer OPD Engineering has been contacted on Malaysia and Thailand incidences.

D. Quality Indicator System - Two (2) reported CQIS reports have been received on Malaysia incidents. Most incidences reported thru Region Specialist - Asia Pacific.

E. Field reports - 13 from Malaysia and Thailand
6 from Malaysia
7 from Thailand

F. Parts sales — Tires are not sold thru Ford dealers. Therefore no service parts count is available on problem tires.

G. Number of accidents/fines and injuries: 2 accidents in Malaysia and Thailand
0 fatalities, 0 major injuries, 0 minor injuries

4. ACTIONS TAKEN IN PRODUCTION; INTERIM (CONTAINMENT) AND/OR PERMANENT

A. Corrective actions – None.

B. Notification – None.

C. Provide WERS alert number - None.

D. Component batch issues – None.

5. VERIFY EFFECTIVENESS OF CORRECTIVE ACTIONS

A. A. None at this time.

6. ESTIMATED PRODUCTION AND PROBLEM STATISTICS (MAGNITUDE OF CONCERN)

A. Production Involved

VEHICLES AFFECTED (BY MODEL AND MODEL YEAR)	ASSEMBLY PLANTS* (INCLUDING KNOCK DOWN OPERATIONS)	VEHICLE PRODUCTION DATES		POTENTIALLY AFFECTED UNITS	
		FROM	UP TO AND INCLUDING	NUMBER OF UNITS	ESTIMATED PERCENTAGE OF VEHICLES THAT CONTAIN THE CONDITION
1997 Explorer	LAP	8/1/96	7/30/97	0	N/A %
1997 Explorer	SLAP	8/1/96	7/30/97	316	3 %

B. FCSD Region Specialist - Asia Pacific

7. AFTERMARKET PARTS

A. Released for Service: part is not released by Ford for service.

B. Tires are not stocked by depot or by Ford dealers. Firestone is aware of this tire concern and will determine whether they want to purge their inventory of tires at their distributor and tire stores in these export regions.

8. ASSESSMENT OF EFFECT ON VEHICLE OPERATION

In the event that a tire tread separates while the vehicle is traveling at extremely high rates of speed, the driver may have reduced or complete loss of steering control.

9. DESCRIPTION OF CONCERN SOLUTION AND PARTS REQUIREMENTS (FIELD SERVICE ACTIONS)

Short Term Actions:

A. Explorer OPD Chassis Engrg. has proven out one Goodyear tire made in Malaysia. Vehicle Development has completed their ride and handling evaluations of the Goodyear 235/75R15 109T A/T BSW Wrangler RT/S with Ford part number YL24-1508-EA and DOT code T8HL2A24. All other tire requirements are completed.

We will be re-flashing the engine controller to lower the top speed of the vehicle from 106 mph to 99 mph. This will put the vehicle top speed two T&RA speed steps (12mph) below the tires "T" speed capability.

On '97 vehicles we will be replacing the 5 Firestone tires with 5 Goodyear tires.

B. The Goodyear tire (made in Malaysia) was selected because it has a higher speed capability ("T" versus "S") and can therefore withstand more internal tire temperature before tread separation can occur.

-Also the tire is constructed more like a light truck (LT) tire than a P metric tire to take the severe punishments of these countries bad roads and overloading conditions. This tire does not have a low rolling resistance construction.

Long Term Actions:

A. No long term prime action has been assessed yet.

B. Test processes, plant complexity, market wants and other factors will be thoroughly considered in developing a long term action.

10. PROGRAM PARTS SIGN OFF/AVAILABILITY

Goodyear Wrangler RT/S tire 235/75R15 A/T BSW part number (YL24-1508-EA) and (DOT code T8HL2A24) is available and fully approved as an after market tire. This tire is built in Malaysia for the aftermarket. No tooling is needed for this part number.

Part availability schedule:

YL24-1508-EA DOT code T8HL2A24	Goodyear to build tires to meet demand of owner's notification

11. SUPPLIER INVOLVEMENT (if applicable)

A. The name of the causal part supplier:

Bridgestone / Firestone, Inc.
One Towne Square, Suite 1470
Southfield, MI 48076-3705
John Behr, Account Executive 248-208-3623

B. This condition is component-related, and is specifically related to the unique customer usage patterns and environmental conditions of the Persian Gulf Coast States.

C. Percentage of the root cause contributed by the supplied component - TBD

D. Do NOT deliver copy of this paper to tire buyer George Coundouriotis when completed and approved.

E. Manufacturing site code for the responsible supplier location - F593A.

F. Judith Sullivan JSULLIV4 x-47679 (Manager) / George Coundouriotis GCOUNDOU x-46803 (Buyer). Ford STA field engineer for Firestone is Lewis Garcia LGARCIA3 at 313-248-6211.

G. At the time of Advice of Field Service Action is approved, the engineer must forward the revised Field Service Action Evaluation paper to the FAO Controllers Office (QMP, MD626, PO. 1587A, Room 486) in North America, or to GB-15/4B-E15 in Europe.

12. FINANCIAL IMPLICATIONS

A. **Note:** If assistance is needed, contact the **Ford Customer Service Division, Recalls & Service Programs (For Europe: Room GB-1/329, Telephone: 8734-2049, for North America, DSC II, Room 785, 24-88817).**

		Vehicle Volume	Cost Per Unit	Total Cost (000)
A	Program Administration Costs	316	$0.65	$0.205
B	Inspection Costs (Units to be Inspected but Not Modified) . Labor (0.2 hours x $60.17)	0	$12.03	$0
C	Modification Costs(Units to be Inspected and Modified)			
	• Parts (priced at dealer price $84 plus __40__%) =	316	$560.00	$176.960
	$112x5=$560	316@0.4x60.17	$24.07	$7.606
	• Labor (1.5 hours x $60.17)	316@1.5x60.17	$90.26	$28.522
D	NGS Cards and Flash Cables			$7.500
E	Dealer Administration Allowance (for safety and emissions recalls only) [0.1 hours x $ $60.17 labor rate – N.A.]	0	$6.02	$0
F	Total Cost (total A through E)	316	$694.40	$219.430
G	Percentage of Recommended Supplier Recovery (if applicable or TBD if unknown)			% __TBD__
H	Supplier Impact (E * F, if applicable)			TBD
I	Net FORD Exposure (E-G)			**$219.430**
J	Potential Warranty Offset	316	$0.00	**$0**

Purchasing, Engineering, and other appropriate activities will jointly determine the extent of supplier financial responsibility. If supplier reimbursement is warranted in the field service action, purchasing will negotiate cost recovery.

13. PREVENT ACTIONS

A. Low inflation operating situation -

- Low pressure warning device (part of IVD) is being recommended for future SUV's (U152, U231, U222) going to this region to warn customer's of under-inflated tires.

Extended/repeated use at extremely high speed -

- Tire SDS, ES spec and WDMO/EEME Regulations to be modified to include the following for SUV's going to Malaysia and Thailand markets:
  - Use tire with speed rating at least one (1) level higher than the vehicle max speed when adjusted for vehicle recommended tire pressure. If this tire construction does not exist, then speed limit the vehicle to one speed level (6mph) below the tires speed capability when adjusted for vehicle recommended tire pressure.

    OR
  - Tire should have a minimum of a "A" temperature rating by the UTQG system.

    AND
  - Tire should be of a "special service" construction for extreme puncture resistance.

Fatigue failure accelerated by high temperature and ozone-

- RVT to establish a test procedure to determine minimum tire requirement for this market. Test will be added to tire SDS and ES Spec. Test availability is scheduled for March 1, 2000 completion.
- Tire design failure mode and affects analysis (DFMEA) needs to be updated with this new failure mode and test requirement above once established.
- New programs (including U152) will meet new SDS requirement for spare tire cannot exceed 63C (145F). U152 is shielding exhaust pipe and tire with a heat shield.

B. Identify how "generic" items or processes could be impacted similarly and how such impact will be prevented.

C. State what "Corporate Memory" Documents (e.g., Engineering Design Standards, World Class Requirements, FMEA, etc.) have been or will be updated to provide guidance for future campaign prevention. Include the scheduled or actual timing for the above actions.

14. REFERENCE DATA

A. Presenter - Allan Rauner, ARAUNER, 59-42821, Explorer Chassis OPD.

B. Each page of the evaluation paper should indicate "Draft of (Date)." Draft papers should not be stamped with a "Record Copy" retention stamp.

C. When programs are recommended for implementation by the Field Review Committee, the reporting organization is to incorporate any changes in the draft paper recommended by the FRC and within two weeks, submit the final paper to the Secretary of the FRC for filing (For North America , Diagnostic Service Center II, Suite 785, for Europe, Room G-1/329, Recall and Service Programs, FCSD-E).

F. Fatigue failure accelerated by ozone exposure

The high ozone levels caused by smoke (burning of forests) chemically attacks the rubber and breaks down the bonds linking the rubber molecules. We see this condition on the outer upper sidewall and shoulder area of the tires as cracks. These cracks can cause tread separation or sidewall bulges.

F. Please check the applicable item(s) in each category:

- Type: X Design ☐ Manufacturing ☐ Vehicle Assembly
  X Other (Specify - Customer - air pressure or Road Hazard -Puncture)
- System: ☐ Body X Chassis ☐ Cooling ☐ Fuel ☐ Electrical ☐ Engine
  ☐ Glass ☐ Restraints ☐ Transmission/Axle
  ☐ Vehicle Label/Publications ☐ Emissions Control
  ☐ OBD ☐ Other
- Symptom: ☐ Brake Control ☐ Emission Compliance
  ☐ Other Regulatory Compliance ☐ Driveability/No Start
  ☐ Engine Speed Control/Unexpected Movement ☐ Fire
  X Steering Control ☐ Occupant Restraint
  ☐ Visibility

3. PROBLEM INVESTIGATION/VERIFICATION DATA

A. Lab tests - None

B. Vehicle tests - None

C. Plant/supplier reports - Supplier (Bridgestone/Firestone) has been contacted in Japan and U.S. on Malaysia and Thailand incidents. Ford Explorer OPD Engineering has been contacted on Malaysia and Thailand incidences.

D. Quality Indicator System - Two (2) reported CQIS reports have been received on Malaysia incidents. Most incidences reported thru Region Specialist - Asia Pacific.

E. Field reports - 13 from Malaysia and Thailand
6 from Malaysia
7 from Thailand

F. Parts sales — Tires are not sold thru Ford dealers. Therefore no service parts count is available on problem tires.

G. Number of accidents/fines and injuries: 2 accidents in Malaysia and Thailand
0 fatalities, 0 major injuries, 0 minor injuries

4. ACTIONS TAKEN IN PRODUCTION; INTERIM (CONTAINMENT) AND/OR PERMANENT

A. Corrective actions – None.

B. Notification – None.

C. Provide WERS alert number - None.

D. Component batch issues – None.

5. VERIFY EFFECTIVENESS OF CORRECTIVE ACTIONS

A. A. None at this time.

6. ESTIMATED PRODUCTION AND PROBLEM STATISTICS (MAGNITUDE OF CONCERN)

A. Production Involved

VEHICLES AFFECTED (BY MODEL AND MODEL YEAR)	ASSEMBLY PLANTS* (INCLUDING KNOCK DOWN OPERATIONS)	VEHICLE PRODUCTION DATES		POTENTIALLY AFFECTED UNITS	
		FROM	UP TO AND INCLUDING	NUMBER OF UNITS	ESTIMATED PERCENTAGE OF VEHICLES THAT CONTAIN THE CONDITION
1997 Explorer	LAP	8/1/96	7/30/97	0	N/A %
1997 Explorer	SLAP	8/1/96	7/30/97	386	3 %

B. FCSD Region Specialist - Asia Pacific

7. AFTERMARKET PARTS

A. Released for Service: part is not released by Ford for service.

B. Tires are not stocked by depot or by Ford dealers. Firestone is aware of this tire concern and will determine whether they want to purge their inventory of tires at their distributor and tire stores in these export regions.

8. ASSESSMENT OF EFFECT ON VEHICLE OPERATION

In the event that a tire tread separates while the vehicle is traveling at extremely high rates of speed, the driver may have reduced or complete loss of steering control.

10. PROGRAM PARTS SIGN OFF/AVAILABILITY

Goodyear Wrangler RT/S tire 235/75R15 A/T BSW part number (YL24-1508-EA) and (DOT code T8HL2A24) is available and fully approved as an after market tire. This tire is built in Malaysia for the aftermarket. No tooling is needed for this part number.

Part availability schedule:

YL24-1508-EA DOT code T8HL2A24	Goodyear to build tires to meet demand of owner's notification

11. SUPPLIER INVOLVEMENT (if applicable)

A. The name of the causal part supplier:

Bridgestone / Firestone, Inc.
One Towne Square, Suite 1470
Southfield, MI 48076-3705
John Behr, Account Executive 248-208-3623

B. This condition is component-related, and is specifically related to the unique customer usage patterns and environmental conditions of the Persian Gulf Coast States.

C. Percentage of the root cause contributed by the supplied component - TBD

D. Do NOT deliver copy of this paper to tire buyer George Coundouriotis when completed and approved.

E. Manufacturing site code for the responsible supplier location - F593A.

F. Judith Sullivan JSULLIV4 x-47679 (Manager) / George Coundouriotis GCOUNDOU x-46803 (Buyer). Ford STA field engineer for Firestone is Lewis Garcia LGARCIA3 at 313-248-6211.

G. At the time of Advice of Field Service Action is approved, the engineer must forward the revised Field Service Action Evaluation paper to the FAO Controllers Office (QMP, MD626, PO. 1587A, Room 486) in North America, or to GB-15/4B-E15 in Europe.

12. FINANCIAL IMPLICATIONS

A. **Note:** If assistance is needed, contact the **Ford Customer Service Division, Recalls & Service Programs (For Europe: Room GB-1/329, Telephone: 8734-2049, for North America, DSC II, Room 785, 24-88817).**

		Vehicle Volume	Cost Per Unit	Total Cost (000)
A	Program Administration Costs	386	$0.65	$0.251
B	Inspection Costs (Units to be Inspected but Not Modified) . Labor (0.2 hours x $60.17)	0	$12.03	$0
C	Modification Costs(Units to be Inspected and Modified)			
	• Parts (priced at dealer price $84 plus __40__%) =	386	$560.00	$216.160
	$112x5=$560	386@0.4x60.17	$24.07	$9.290
	• Labor (1.5 hours x $60.17)	386@1.5x60.17	$90.26	$34.838
D	NGS Cards and Flash Cables			$7.500
E	Dealer Administration Allowance (for safety and emissions recalls only) [0.1 hours x $ $60.17 labor rate – N.A.]	0	$6.02	$0
F	Total Cost (total A through E)	386	$694.40	$268.039
G	Percentage of Recommended Supplier Recovery (if applicable or TBD if unknown)			% __TBD__
H	Supplier Impact (E * F, if applicable)			TBD
I	Net FORD Exposure (E-G)			**$268.039**
J	Potential Warranty Offset	386	$0.00	**$0**

Purchasing, Engineering, and other appropriate activities will jointly determine the extent of supplier financial responsibility. If supplier reimbursement is warranted in the field service action, purchasing will negotiate cost recovery.

13. PREVENT ACTIONS

A. Low inflation operating situation -

- Low pressure warning device (part of IVD) is being recommended for future SUV's (U152, U231, U222) going to this region to warn customer's of under-inflated tires.

Extended/repeated use at extremely high speed -

- Tire SDS, ES spec and WDMO/EEME Regulations to be modified to include the following for SUV's going to Malaysia and Thailand markets:

  -Use tire with speed rating at least one (1) level higher than the vehicle max speed when adjusted for vehicle recommended tire pressure. If this tire construction does not exist, then speed limit the vehicle to one speed level (6mph) below the tires speed capability when adjusted for vehicle recommended tire pressure.

  OR

  - Tire should have a minimum of a "A" temperature rating by the UTQG system.

  AND

  -Tire should be of a "special service" construction for extreme puncture resistance.

Fatigue failure accelerated by high temperature and ozone-

- RVT to establish a test procedure to determine minimum tire requirement for this market. Test will be added to tire SDS and ES Spec. Test availability is scheduled for March 1, 2000 completion.

- Tire design failure mode and affects analysis (DFMEA) needs to be updated with this new failure mode and test requirement above once established.

- New programs (including U152) will meet new SDS requirement for spare tire cannot exceed 63C (145F). U152 is shielding exhaust pipe and tire with a heat shield.

B. Identify how "generic" items or processes could be impacted similarly and how such impact will be prevented.

C. State what "Corporate Memory" Documents (e.g., Engineering Design Standards, World Class Requirements, FMEA, etc.) have been or will be updated to provide guidance for future campaign prevention. Include the scheduled or actual timing for the above actions.

14. REFERENCE DATA

A. Presenter - Allan Rauner, ARAUNER, 59-42821, Explorer Chassis OPD.

B. Each page of the evaluation paper should indicate "Draft of (Date)." Draft papers should not be stamped with a "Record Copy" retention stamp.

C. When programs are recommended for implementation by the Field Review Committee, the reporting organization is to incorporate any changes in the draft paper recommended by the FRC and within two weeks, submit the final paper to the Secretary of the FRC for filing (For North America , Diagnostic Service Center II, Suite 785, for Europe, Room G-1/329, Recall and Service Programs, FCSD-E).

1995 / 99 Explorer/Mountaineer P255/70R16 Tire Separation in GCC Countries

PROBLEM DESCRIPTION

WDMO reported from GCC countries that while driving vehicle, the tire tread separated (belt edge separation) from the main carcass of the tire. The tire failure is discovered when the driver hears the tire tread hitting the wheel house or the tire goes flat.

ROOT CAUSE

The investigation identified a combination of the following five (5) root causes for tread separation:
1) Low inflation operating situation - causing internal tire damage resulting in tread separation
2) Extended / repeated use at extremely high speed in high ambient temperatures
3) Extended / repeated use at overloaded conditions in high ambient temperatures
4) Fatigue failure accelerated by high ambient temperatures
5) Fatigue failure accelerated by ozone exposure (in areas near oil fields)

PROBLEM INVESTIGATION

WDMO reported that 19 incidences of tread separation have occurred in the GCC region. These failures have been on '96 and '97 vehicles, all at mileage's between 9,500 - 34,000 miles. The tire in question is the Firestone P255/70R16 A/T ROWL tire, part # F57A-1508-JA, construction code ST369J.

It has been noted that vehicles in this region drive at extremely high speed (100-106mph) for extended periods of time, many times a year. It has also been noted that ambient temperature in this region of the world exceed 135F with unofficial temperatures as high as 150F. With ambient temperature this high, the road surface that the tire sees can reach in excess of 200F. These high temperatures can degrade the tire structure.

Conducted special high speed tire tests at reduced pressures (20psi) on several different tire constructions to see if any competitive tires held up better at extended high speed at reduced pressure. It was found that the tires tended to follow the tire speed rating on the tire. This Firestone tire has only a 2mph speed cushion between the speed capability of the tire and the speed capability of the vehicle, less than any other Ford vehicle exported to this region.

ACTIONS TAKEN

Conducted a owner notification in the GCC region for 6755 '95 thru '99 Explorer and Mountaineer vehicles to replace the tires with a Goodyear tire that was used on F150 and Expedition vehicles sold in the region in '96 and '97 with no reported incidences of tread separation. Also, the maximum speed of the vehicles are being reduced from 106mph to 99mph (via a new E-PROM) to give the tires a larger speed cushion between the tire and vehicle maximum speed capability.

The 2000 Explorer's will not be exported into GCC because of late introduction of the model into the market because of tire availability and the early cancellation of the UN150 vehicle so that there are no vehicles on hand when the U152 model arrives.

Explorer Chassis OPD department is going into the southwest and request 500 tires be returned to Firestone for a statistical analysis of tire failures in this area of the country that is similar to the temperatures experienced in GCC region. This analysis will take several months to get tires off of vehicles that are returning from leases and turn-ins, and analyze them at Firestone in Akron.

Firestone is developing a test procedure that duplicates the failure mode in GCC region, so that we can test future tire designs to prove they won't have this same problem. Timing for this test procedure is 3-1-00.

Firestone is working on a new "rest of world tire" for U152 which will be more puncture resistant and have excess speed capability than the truck requires to give the vehicle a greater speed cushion for GCC.

RECOMMENDATION

Explorer Chassis OPD Engineering recommends closure of this concern based on the following:

. OPD engineering has taken short term and long term corrective action.
. WDMO / OPD engineering has performed a owners notification in the region that has the problem.
. Root cause identified and permanent corrective actions are in place.
. OPD engineering has implemented a plan to visit the southwest to determine if the problem exists in the U.S.

9-7-99

Allan Rauner
Explorer Chassis OPD Engineering

Jeanette Madej
Explorer Chassis OPD Supervisor

BRIDGESTONE FIRESTONE VENEZOLANA C.A.
RIF. [illegible]
Carretera Nacional Valencia - Los Guayos
Apdo. 194 - Valencia 2003 - A
E-Mail: [illegible]
Telef: (041) 1407 611 - 33.34.70
Fax: (041) 38.56 77 - 32.15.51 - 33.82.73
Valencia, Edo. Carabobo
Venezuela

JAG312/99
Valencia, August 24, 1999

Mr. E. Cassingena
President
Ford Motor de Venezuela, S.A.
Valencia

Dear Mr. Cassingena:

As agreed during the meeting held on July 29, 1999, we have proceeded to fully investigate the use of the tire Wilderness, sizes P235/75R15a and P255/70R16 in order to determine which actions are needed and establish a plan to meet our customer's needs.

Reports, documents, conclusions and recommendations regarding the inspections made, follow:

1. Document #1 contains a report by Messrs. Bruce Halverson and Roger Marble regarding the visits made to Ford Dealers in the Maracaibo, Cabimas, Punto Fijo and Barquisimeto Areas. Oscar Romero, Roselia Moreno and Edivia Caballero from Ford Venezuela and Luis Abreu and Pedro Martinez from BFVZ also participated in these visits.

2. Document #2: Summary of the main issues, possible causes and effects of the findings by BFVZ's Technical Department and recommendations after said evaluations.

3. Document #3: Summary of the survey made by BFVZ with the owners of Ford Explorer.

4. Based on the findings we are recommending a program as attached under "Document 4", Training program to Ford Dealers, and special work in conjunction with BFVZ dealers and BFVZ personnel.

BRIDGESTONE FIRESTONE VENEZOLANA C.A.
RIF [illegible]

Carretera Nacional Valencia - Los Guayos
Apdo. 184 - Valencia 2003 - A
E-Mail: [illegible]
Telef. (041) 437 011 - 33 34 70
Fax: (041) 38 58 77 - 32 15 51 - 33 82 73
Valencia, Edo. Carabobo
Venezuela

In addition to the above mentioned subjects and in particular to carry out an intensive program to identify if there are any problems which were not detected in the inspections, we have prepared a promotion for owners of Sports Utility Vehicles, offering a very interesting incentive to visit our service centers.

We are also in the process of preparing a brochure on the correct use and maintenance of the tires, which will be delivered to all Ford and BFVZ dealers to be distributed to Ford customers.

Through these programs we continue making all possible efforts to meet all the requests not only of Ford but also of all our customers. Should you require additional information regarding these reports, please do not hesitate in contacting us.

Sincerely,

J. A. Gonzalez
Jorge A. Gonzalez
President & Managing Director

cc: Sres. H. Rodríguez – Ford de Venezuela
O. Romero – Ford de Venezuela
A. Da Silva – Ford de Venezuela
G. Pereira – Ford de Venezuela
C. Marón – Ford de Venezuela
A. Stuart – BFOE, Southfield
H. Horton – BFS, Akron
R. Martin – BFS, Nashville
O. Rodríguez – BFVZ
L. Abreu – BFVZ
P. Martinez – BFVZ

DOCUMENT 1

VENEZUELA TIRE SURVEY: AUGUST 2-5, 1999

FORD EXPLORER:	**P255/70R16 WILDERNESS AT**
	P235/75R15 RADIAL ATX

TEAM: **FORD:**
Carlos Maron, Head of Local Development (meeting only)
Oscar Romero, Manager Engineering Service and Vehicle Evaluation
Roselia Moreno, Purchasing Products Engineer, Explorer
Edivia Caballero, Service Engineer, Explorer and Ranger

BFS:
Bruce Halverson, Manager Market Quality Engineering
Roger Marble, Senior Project Engineer Latin America Tire Development
Luis Abreu, Technical Manager Valencia Plant
Pedro Martinez, O.E. Sales Valencia

FORD DEALERS VISITED:

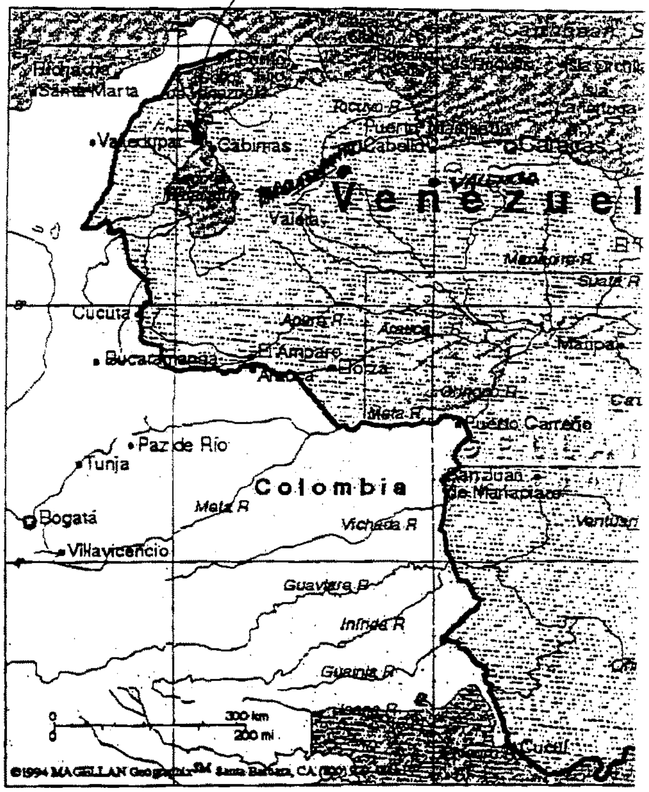
Lago Motors	Maracaibo
Auto Cabimas	Cabimas
Punto Fijo Motors	Punto Fijo
Ucel	Barquisimento

WORLDWIDE DISASTER AID AND INFORMATION VIA THE INTERNET

Venezuela Map

Posted on Thu, 10 Jul 1997 14:27:31 GMT

MARACAIBO



Map courtesy of Magellan Geographix

0500631

TOTAL VEHICLES AND TIRES

- 36 Explorers * (Recorded VIN and odometer readings)
- 132 tires (Recorded Inflation, DOT serial, RTD, Chip/Tear, Repairs)

	Wilson	Valencia
P255/70R16 Wilderness AT	23	33
P235/75R15 Radial ATX	3	73

FORD USA INFLATION SPECIFICATION:	30 psi Front	30 psi Rear
FORD VENEZUELA INFLATION SPECIFICATION:	28 psi Front	26 psi Rear
Tires with inflation below Ford Specified	12	12

Tires with pressure below 20 psi.

RR	11 psi	2 nails/sidewall cut/tread cut to steel
RR	16 psi	1 bolt in tread, (slow leak)
RR	17 psi	could not inspect tread area
RR	19 psi	could not inspect tread area
RR	15 psi	could not inspect tread area
Spare	0 psi	puncture (tire was removed from RR position)

* Three Explorers not included in data because of tire brand, and size fitment

MARACAIBO:

Vehicle Mileage	**29,211 Km**	**to**	**113,335 Km**
Ave Tire Wear	**30 %**		
Tires inspected	**44**		

Damage Conditions

Tread cut to steelcord	**7**
Thorn to steelcord	**1**
Screw/nails	**2 (11psi)**
Belt	**1 (16 psi)**
Total	**11 tires**

25% are Potential Problem Tires

1 P235/70R13 W2…037 with BLB condition. Tire had a repair on the IL and Penetration visible in #1 belt.

CABIMAS:

Vehicle Mileage	**25,158**	**to**	**46,211**
Ave Tire Wear	**25%**		
Tires inspected	**20**		

One tire with low inflation 17psi

PUNTO FIJO:

Vehicle Mileage	13,755Km	to	40,289Km
Ave Tire Wear	25%		
Tires Inspected	16		

1 tire with low inflation (19psi)

BARQUISIMENTO:

Vehicle Mileage	12,227Km	to	103,293Km
Ave Tire Wear	20%		
Tires Inspected	24		

2 tires with low inflation (19psi, 15psi)

LR & RR tires on Explorer with 103,294 Km worn to 3mm and 4mm(probably original tires)

COMMENTS:

REPAIRS- We observed only one repair of the type where the plug extends up through the puncture from the inside of the tire.

TREAD/CHIP CONDITIONS- The definition of these conditions is:

1= condition observed by trained tire engineer
2= condition observed by customer but he would not be concerned about it.
3= condition observed by customer and he would object

132 tires were inspected and had the following conditions:

Rating of 1 = 61%
Rating of 2 = 17%
Rating of 3 = 1.5%

Tire age- The oldest tire was a P255/70R 16 Wilderness AT with a DOT serial of VN.504. The total distribution was:

1999	5 %
1998	61%
1997	22 %
1996	7 %
1995	2 %
1994	1 %

SERVICE CONDITIONS:

-The main highways are tarmac but are not particularly smooth. In the hill areas the drop off at the edge of the roads is steep.

-City streets are very rough and have lot of chuck holes.

-Highway speeds are unrestrained although there are posted limits. (We experienced speeds up to 95 mph for lengthy periods of time.)

- Driving habits are aggressive.

SUMMARY:

Low inflation operating conditions caused by any of the following can cause damage to the tire when it continues to be run with inadequate pressure:

- punctures, cuts which cause slow leak, and tire continues to be used with low inflation

- poor tire maintenance

- improper repairs

POSSIBLE ACTIONS:

FORD: Send customer letters on the importance of tire inflation

Increase recommended inflation pressure on the vehicle

Educate Ford Dealers on the importance of tire maintenance, i.e. inflation and visual inspection

BFS: Check RMA for tire repair charts for Spanish Translation

Special collection of tires submitted for adjustment from Explorers, Blazers, and Toyota SUV's for analysis in Valencia.

NOTE: The week of July 4, 1999, Valencia began to ship P255/70R16Wilderness tires to Ford with polyester body ply and a cap ply for the nylon body P235/75R15 Radial ATX added a cap ply. We did not see any of those tires in the survey.

"Free Translation"
Document 2

(PRELIMINARY REPORT)

SUMMARY OF THE EXPLORER SURVEY

Source of Information	Problem	Observations or possible Causes	Result or possible Effects
TIRE EVALUATION IN EXPLORER VEHICLES BEING SERVICED IN FORD DEALERS LOCATED AT: MARACAIBO, CABIMAS, PUNTO FIJO AND BARQUISIMETO 132 TIRES INSPECTED	Low Inflation pressure 8 Tires = 6 %	1) Punctures with nails, screws, glass and others metallic objects. Repairs may not be adequate 4 Tires = 3 %	Steelcord corrosion which may result in Tire separation and tread belt leaving belt and casing
		2) Protruded weld spots on rim surface. - Valve failures - Poor maintenance of inflation pressure	Progressive air leak, which favors the heat generation, flexion and fatigue of the tire inducing tread separation and tire failure
	Tread Cuts to Tire Steelbelt	3) Impact with metallic objects, glass and others sharp edge objects	Same as Item 1
	Low Inflation pressure in Explorer vehicles in FORD Showroom	4) Protruded weld spots on rim surface - Tires coming with low inflation pressure from OEM. Plant	Same as Item 2
BFVZ Survey to Explorer users Total contacted customers : 2.183 Satisfied Customers = 1.703 78 % Reporting Incidence = 480 22 %	Punctures (159)	- With nails, screws and others objects in the driveways	Same as Item 1
	Sidewall undulations (64)	- Wide sidewall splices	Visual effects
	Vibrations (63)	- High tire/rim run-out - Unbalance of rim/tire set or wheel mounting chuck	Vehicle vibration vertically and horizontally
	Irregular tread wear (38)	- Unbalance of tire/rim set or wheel mounting chuck - Vehicle wheel miss alignment - Tire are not being rotated periodically	Premature and irregular tread wear
	Tire slips in wet surface (16)	Need to be investigated by BFS and FORD Technical Areas	
	Impact breaks (34)	Impacts with objects in the driveways	Body ply breakage and tire must be scrapped
	Tread separations (31)	Same as Item 1, 2, 3, and 4	
	OTHERS (75)		
L.B. ABREU's visit to El Tigre, Anzoátegui	Explorer vehicle roll over due to tread leaving casing	- Excessive speed 173 Km/Hr (26 Km in 9 Minutes) - Heavy load, 8 passengers plus luggage. - High pavement temperature (55°C at 1.20 p.m)	Tire fatigue and separations

Document 2

(REPORTE PRELIMINAR)

RESUMEN DE ESTUDIO SOBRE EXPLORER

Fuente de Información	Problema	Observaciones o Causas posibles	Resultado o Efecto posible
Evaluación de Cauchos de Explorers en servicio en las concesionarias de Maracaibo, Cabimas, Pto. Fijo y Barquisimeto 132 Cauchos Inspeccionados	Baja presión de Inflado 8 cauchos = 6 %	1) Pinchazos con clavos, tornillos, vidrios y objetos metálicos. Las reparaciones podrían no ser adecuadas 4 cauchos = 3 %	Corrosión en los Alambres de Acero, lo cual produce a la larga separación y pérdida de la banda de rodamiento
		2) - Protuberancias en la costura del rim (puntos de soldadura) - Falla de válvula - Falta de mantenimiento en Presión de Inflado	Fuga progresiva del aire, lo cual favorece el aumento en la generación de calor, flexión y fatiga del caucho, induciendo las separaciones en la banda
	Cortes en la banda de rodamiento, alcanzando los Alambres de Acero 8 cauchos = 6 %	3) Impactos con objetos metálicos, vidrios y otros objetos cortantes.	Igual al Punto 1
	Baja presión de Inflado en los vehículos en exposición (22 y 26 psi)	4) - Protuberancias en la costura del rim - Baja presión de Inflado en planta Ford.	Igual al Punto 2
Encuesta hecha por BFVZ a usuarios de Explorer Total Clientes Contactados 2.183 (Satisfechos) = 1.703 78 % (Reportando Incidencias) = 486 22 %	Pinchazos (159)	Penetración por clavos, tornillos y otros objetos en las vías	Igual al Punto 1
	Ondulaciones en la Pared (64)	Ancho en los empates de tela de cuerpo	Efecto visual
	Vibraciones (63)	- Alto run out del caucho o rim - Desbalanceo del conjunto caucho/rim y/o manzana	Vibraciones del vehículo en forma horizontal y vertical entre 80 y 120 Km / Hr
	Desgaste irregular de Banda de Rodamiento (38)	- Desbalanceo del conjunto caucho/rim y/o manzana - Desalineación del vehículo - Falta de rotación de los cauchos	Desgaste prematuro e irregular de la Banda de Rodamiento
	Caucho patina en húmedo (16)	Necesita ser investigado por las Areas Técnicas de Bridgestone Firestone y Ford	
	Ruptura por Impacto (34)	Golpe con objeto en la vía y con las aceras	Pérdida del caucho por la ruptura de las lonas (telas)
	Separación en la Banda de Rodamiento (31)	Igual que puntos # 1, 2, 3, y 4	
	Otros (75)		
Visita de L. E. Abreu a El Tigre, Estado Anzoategui	Volcamiento de vehículo por pérdida de Banda de Rodamiento	- Exceso de velocidad - 173 Km/Hr Aprox. (26 Km en 9 minutos) - Carga pesada (8 pasajeros más equipaje) - Alta temperatura del pavimento (55°C) (1.20 pm)	Fatiga del caucho y Separaciones

"Free Translation"
Document 2

RECOMMENDATIONS

(Based on investigation done in sites and surveys)

1. Send customer letters on the importance of tire inflation.

2 Request FORD Engineering to consider adopting U.S.A. inflation standards for Venezuela :

	Tire Inflation Pressure	
	Front	Rear
VENEZUELA	28 psi	26 psi
U. S. A.	30 psi	30 psi

3. Educate FORD Dealers on the importance of tire maintenance of inflation pressure and visual inspection of tires while vehicle is in service.

4. Distribute to all tire repair shops a tire repair manual for punctures.

5. Investigate with the Technicians and Development Engineers of FORD Detroit and BFS Akron / Nashville :

   Possibility of changing tread compound to improve traction and ride/handling in dry and wet pavement.

6. Improve service / communications between FIRESTONE Distributors and FORD Dealers to give better service to the final user (THE CUSTOMER)

Document 2

RECOMENDACIONES

(Basadas en las investigaciones realizadas)

1. Enviar a los usuarios de Explorer una carta donde se le explique la importancia de la presión de inflado.
Colocar el mismo folleto en el manual del propietario de cada vehículo a vender.

2 Solicitar al Dpto. de Ingeniería de FORD, considerar adoptar la presión de inflado del caucho usada en U.S.A, para las Explores fabricadas en Venezuela

	Presión de Inflado del Caucho	
	Delantero	Trasero
VENEZUELA	28 psi	26 psi
U. S. A.	30 psi	30 psi

3. Educar a los concesionarios en la importancia de un buen mantenimiento de la presión de inflado y chequeos de los cauchos en los vehículos en servicio.

4. Distribuir en todos los establecimientos de reparación de cauchos, un folleto práctico de correcta reparación de pinchazos.

5. Investigar con los Técnicos y Desarrollo de Proceso FORD Detroit y BFS Akron / Nashville
   - Posibilidad de cambiar compuesto de rodado para mejorar tracción y manejo en pavimento seco y húmedo.

6. Mejorar el enlace entre distribuidores FIRESTONE y concesionarios con el fin de prestar un mejor servicio al usuario final.

BRIDGESTONE Firestone

DEPARTAMENTO DE MERCADEO

Document 3

PARA: GERTRUDYS SOTO

C.C.: J. GONZALEZ / O. RODRIGUEZ / P. MARTINEZ / L. ABREU

DE: FERNANDO ARAQUE

ASUNTO: RESUMEN DE ENCUESTA EXPLORER

FECHA: AGOSTO 20 DEL 99

A la fecha se han realizado 10.173 llamadas telefónicas de las cuales 2.183 (21%) se ha establecido contacto positivo (encuesta) con los clientes, mientras el complemento (7.990 que representa 79%), no se ha establecido contacto aún, por diferentes motivos tales como: no se localiza el cliente, cambio de teléfono, las llamadas caen en fax, mal suministro de la base de datos, etc. Del total de contactos positivos, 1.703 se declararon satisfechos con nuestros cauchos (78%) y, clientes que según su punto de vista, presentan alguna inconformidad 480 (22%) se encuentran detallados en **"Pareto"** anexo. Nuestro departamento de Ingeniería de Campo, está contactando a los clientes no satisfechos a fin de atender sus reclamos.

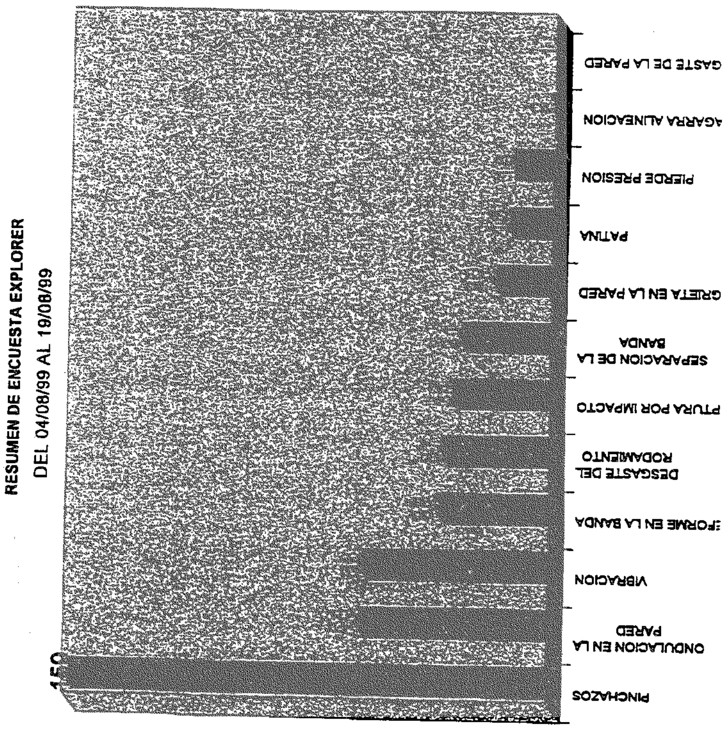
Comentarios Adicionales de los Usuarios:

- Desconocen la garantía de los cauchos por 5 años.
- Caucho débil en los costados y el rodado.
- Perdida de aire de hasta 4 lbs/mes.
- Vehículo vibra a más de 100 kms. Por hora.
- Es inestable en terreno húmedo; patina frecuentemente.
- El rumor por parte de los Concesionarios Ford, acerca de que el caucho presenta problemas.
- En la mayoría de los problemas reportados en las encuestas, son los hijos de los propietarios los que conducen el vehiculo

Sin nada más por los momentos se despide de Ud.

Atentamente,

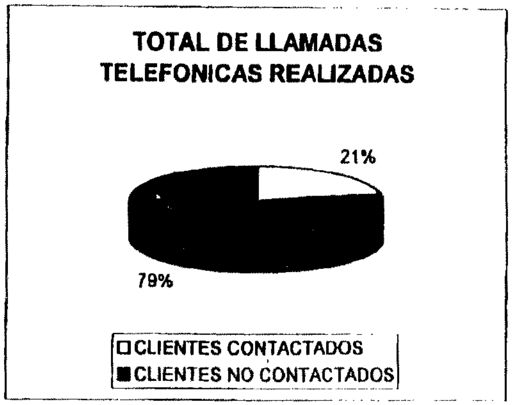
Fernando Araque


RESUMEN DE ENCUESTA EXPLORER
DEL 04/08/99 AL 19/08/99
150
GASTE DE LA PARED
AGARRA ALINEACION
PIERDE PRESION
PATINA
GRIETA EN LA PARED
SEPARACION DE LA BANDA
PTURA POR IMPACTO
DESGASTE DEL RODAMIENTO
FORME EN LA BANDA
VIBRACION
ONDULACION EN LA PARED
PINCHAZOS

Glosario de Términos del Pareto.

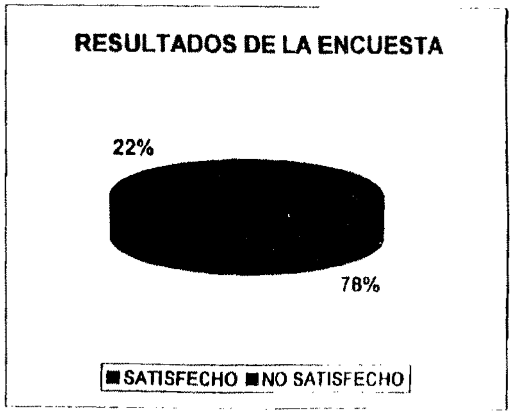
- **Pinchazos:** Objeto extraño que penetra en la superficie del neumático; Ej. Tornillos, pedazos de vidrio, clavos, etc.
- **Ondulación en la Pared:** Depresión provocada por sobre medida del empate de tela.
- **Vibración:** Irregularidad en la redondez radial que experimenta el neumático o el rim.
- **Desgaste de Rodamiento:** Provocado por problemas mecánicos del vehículo.
- **Patina:** Deslizamiento del neumático sobre pavimento húmedo.
- **Perdida de Presión:** Puede ser ocasionado por fugas de aire del neumático, rim y/o válvula.
- **Ruptura por Impacto:** Ocasionado por impacto del caucho contra objetos extraños, Ej. Pared, hueco, etc.
- **Grieta en la Pared:** Cualquier irregularidad que presente la pared del caucho, que pueda ser apreciada visualmente por el cliente.
- **Separación de Banda:** Separación entre la banda de rodamiento y/o entre estabilizadores de acero que resulta en perdida de la banda de rodamiento, quedando descubierta la carcaza del caucho.
- **Deformidad en la Banda:** Cualquier irregularidad que presenta la banda de rodamiento del caucho, que puede ser apreciada visualmente por el cliente.

RESUMEN DE ENCUESTA EXPLORER
DEL 4 AL 19 DE AGOSTO DEL 99



TOTAL DE LLAMADAS TELEFONICAS REALIZADAS

CLIENTES CONTACTADOS	2.183
CLIENTES NO CONTACTADOS	7.990
TOTAL	10.173



RESULTADOS DE LA ENCUESTA

SATISFECHO	1.703
NO SATISFECHO	480
TOTAL	2.183

BRIDGESTONE Firestone

MARKETING DEPARTMENT

"Free Translation"
Docuemnt #3.

TO: GERTRUDYS SOTO

C.C.: J. GONZALEZ / O. RODRIGUEZ / P. MARTINEZ / L. ABREU

FROM: FERNANDO ARAQUE

SUBJECT: EXPLORER SURVEY SUMMARY

DATE: AGOSTO 20 DEL 99

To this date 10.173 calls have been made, from which 2.183 (21%) have resulted in successful contacts with the customers, while in the remaining 7.990(which represents 79%) this has not been possible yet, due to different reasons such as: the customer can not be located, changes of the telephone numbers, the calls are received by a fax machine, wrong data, etc. From the total of customers reached, 1.703 declared to be satisfied with our tires (78%), while 480 (22%) dissented from that opinion, as shown in the attached **"Pareto"** diagram. Our Sales Engineering department is contacting all dissatisfied customer in order to review their claims.

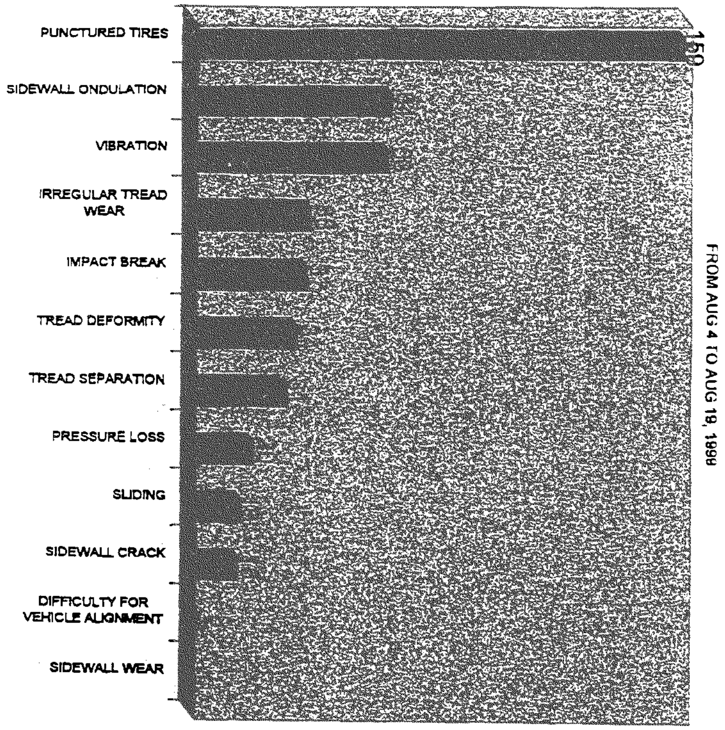
Additional User's Comments

- They do not know the tire warranty.
- The tire is weak in sidewall and tread.
- Air loss up to 4 lbs/month.
- Vehicle vibrates when exceeding 100 kms/hour.
- Unstable in humid surfaces; frequently slides.
- There is a rumor within the Ford dealers, that the tire has problems.
- In the majority of the problems shown in the surveys, the drivers were the children of the owners.

Having nothing further to report, I remain.

Yours Truly,

Fernando Araque

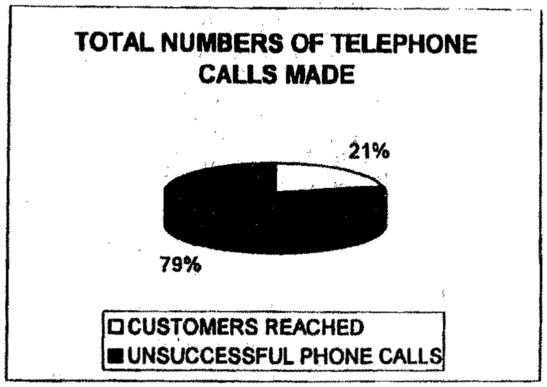


FROM AUG 4 TO AUG 19, 1998

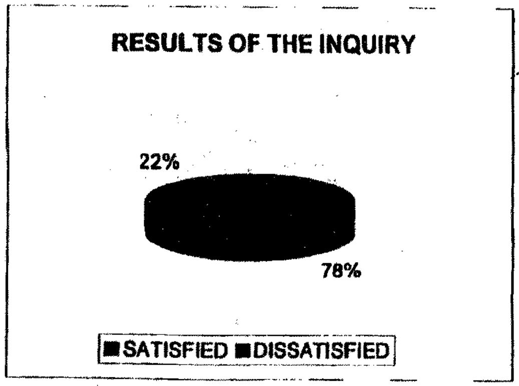
GLOSSARY OF THE PARETO TERMS

- **Punctured Tires:** Foreign object which penetrates the surfaces of the tire: i.e.: screws, piece of glass, nails, etc.
- **Sidewall Ondulation:** Depression caused by the superimposition of the jointure of a very long piece of material.
- **Vibration:** Irregularity in the radial roundness experienced by the tire or the rim.
- **Irregular Tread Wear:** Caused by mechanical problems of the vehicle.
- **Sliding:** Sliding of the tire on wet pavement.
- **Pressure Loss:** May be due to air leakage of the tire, rim and/or valve.
- **Impact Break:** Produced by the impact of the tire against outside objects.
- **Sidewall Crack:** Any irregularity shown in the tire sidewall, that may be visually appreciated by the customer.
- **Tread Separation:** Separation between the tread and/or between the steel stabilizers which results in tread loss and the exposure of tire carcass.
- **Tread Deformity:** Any irregularity shown by the tire tread, which can be visually appreciated by the customer.

SUMMARY OF EXPLORER SURVEY
FROM AUG. 4 TO AUG. 19, 1999



CUSTOMERS REACHED	2.183
UNSUCCESSFUL PHONE CALLS	7.990
TOTAL	10.173



SATISFIED	1.703
DISSATISFIED	480
TOTAL	2.183

BRIDGESTONE FIRESTONE VENEZOLANA, C.A.
RIF: J-00014678-0

Apdo. 184 - Valencia 2003 - A.
Telef: (041) 30.00.11 al 14 33.34.70
Fax: (041) 33.26.88 - 32.15.51 - 33.82.70
Telex: FIREV 45186 VC.
Valencia, Edo. Carabobo.
Venezuela.

Document 4

Valencia, 09 de Agosto de 1999

PAG.: 1 DE 2

Señores : **FORD MOTORS DE VENEZUELA, S.A.**

Atención : **Sr.- Oscar Romero**
Gerente de Servicio.-

Ref.- CHARLA EXPLICATIVA DE ASPECTOS BASICOS DEL NEUMATICO.-

Estimado Oscar :

De acuerdo a lo conversado en dias anteriores, a continuación te detallo las características de la charla a dirigir a la red de concesionarios FORD, a saber:

1.- **Propósito** : Mejorar los conocimientos de la red de concesionario Ford, en relación al análisis y manejos de problemas que se puedan relacionar con neumáticos, mejorando también la relación CONCESIONARIO FORD -DISTRIBUIDOP. FIRESTONE a fin de optimizar el servicio de Atención al Cliente .

2.- Contenido de la charla :
- Construcción/Componentes del neumático.
- Nomenclatura utilizada en la identificación del neumático.
- Indice de Velocidad .
- Indice/Capacidad de carga.
- Política de Garantía BFVZ.
- Importancia correcta de presión de inflado.
- Posibles fallas de un neumático.
- Patrones de desgaste irregular.
- Posibles factores que producen vibración
- Balnceo Dinámico.

3.- Tiempo de Duración :
- Ocho (8) horas.
- Propuesta : 1/2 día y 1/2 día (Dos mañanas consecutivas y 4 horas por día).

Durante el segundo día se hará una dinámica de trabajo entre el Concesionario Ford y el Distribuidor Bridgestone Firestone. En esta actividad participarán el Asesor Técnico y el Gerente de la zona de nuestra oficina de Atención al Cliente para crear un canal de comunicación directo entre ambas partes, con el fin de mejorar el tiempo de respuesta al cliente y por ende mejorar el servicio.

Sin otro particular y esperando de su respuesta a fin de desarrollar esta actividad en la brevedad posible, le saluda.

Atentamente,

Pedro Martínez
Gerente de Venta Equipo Original

C.C.: Srs.- Hector Rodriguez - FORD
Antonio Da silva - FORD
Carlos Maron - FORD
Edivia Caballero - FORD
Jorge González - BFVZ
Oscar Rodriguez - BFVZ
Gertrudis Soto - BFVZ

"Free Translation"
Document 4

BRIDGESTONE FIRESTONE VENEZOLANA, C.A.
RIF.: J-00014678-0

Carretera Nacional Valencia - Los Guayos
Apdo. 184 - Valencia 2003 - A
Telef.: (041) 407811
Fax: (041) 33.26.53 - 32.15.51 - 33.82.75
Telex: FIREV 45168 VC.
Valencia, Edo. Carabobo.
Venezuela.

Valencia, August 19, 1999

Messiers : **FORD MOTOR DE VENEZUELA, S.A.**

Attetion : **Mr. Oscar Romero**
Service Manager

Re: **Training Conference For Ford Dealers And BFS Field Representatives On The Basic Aspects Of The Tire**

Dear Oscar :

In accordance with our conversation in the past few days, please find below the outline of the conference that will be given to the Ford Dealers :

1. **Purpose** : to improve the knowledge of the Ford Dealers' Network, in regards to the analysis and resolution between Ford Dealer´s customers and Firestone Dealers, in order to optimize Customer Service.

2. **Contents of the conference** :

   - Tire Build/Components
   - Nomenclature Used for Tire Identification
   - Speed Index
   - Loading Rate/Capacity
   - BFVZ's Tire Warranty
   - Importance of correct Inflation Pressure
   - Probable Failures Mode
   - Patterns of Irregular Wear
   - Factors that Could Possibly Produce Vibration
   - Dynamic Balance
   - Solution of Customer Dissatisfaccion

3. **Duration:**

   - Eight (8) Hours
   - Proposal: Two (2) consecutive mornings- 4 hours per day

During the second day a work session will be conducted with the Ford Dealer and the Bridgestone Firestone Dealer and the Zone Manager of our Customer Service Office Will participate in this activity in order to create a channel of direct communication on both sides, to improve the response time to the customer, thus improving the service.

Having nothing further to inform and hoping to hear from you soon to the end of implementing this activity the earliest possible, I remain.

Your Truly

Pedro Martínez
Original Equipment Manager

c.c.: Messrs : Hector Rodríguez - FORD
Antonio Da silva - FORD
Carlos Maron - FORD
Edivia Caballero - FORD
Jorge González - BFVZ
Oscar Rodríguez - BFVZ
Gertrudis Soto - BFVZ

BRIDGESTONE FIRESTONE VENEZOLANA,C.A

Valencia , 23 de Agosto de 1999

A : Todos los Gerentes de Zonas

De : Sr. Oscar Rodríguez
Sra. Gertrudys Soto de Garces

La Dirección de Mercadeo y Ventas conjuntamente con la Gerencia de Mercadeo y Operaciones de Ventas ha diseñado una atractiva promoción dirigida a todos los usuarios de Vehículos Rústicos .

Esta actividad será coordinada por la Gerencia de Atención al Cliente y los usuarios conocerán la promoción a través de una cordial invitación extensiva de BFVZ, a visitar el distribuidor autorizado mas cercano (Tire Center , Bridgestone Firestone , Tire Express ó Firestone) y recibir :

- ***REVISIÓN** de sus cauchos **GRATIS***
- *Servicio de **ROTACIÓN** (gratis en caso de ser necesario)*

Toda nuestra red de Distribución debe conocer de nuestra promoción especial y ofrecer el atractivo que nos caracteriza como la empresa líder en la industria del caucho el mejor producto, la mejor atención personalizada y nuestros excelentes precios.

*Los beneficios que obtendremos con esta promoción se verán reflejados en un incremento del trafico de usuarios → **AUMENTO DE LAS VENTAS** .*

Esperando contar con su valiosa colaboración para el desempeño de esta actividad y orgullosos de contar con un valioso equipo humano.

Atentamente ,

Oscar Rodríguez
Director de Mercadeo y Ventas

Gertrudys Soto de Garces
Gerente de Mercadeo y Operaciones de Ventas

BRIDGESTONE FIRESTONE VENEZOLANA C.A.
RIF: [illegible]

Carretera Nacional Valencia - Los Guayos
Apdo. 194 - Valencia 2003 - A
E-Mail: [illegible]
Telef: (041)407.611 - 33.34.70
Fax (041) 38.86.77 - 32.13.51 - 33.82.75
Valencia Edo. Carabobo
Venezuela

Valencia, August 23, 1999

Free Translation

TO: Area Managers

FROM: Oscar Rodriguez
Gertrudis Soto de Garcés

The Sales & Marketing Direction together with the Marketing & Sales Operations Department has launched an attractive promotion for all users of Light Truck and Sports Utility vehicles.

This activity will be coordinated by the Department of Customer Service and the users will be informed by an invitation from BFVZ to visit their nearest BFVZ dealer (Tire Center, Bridgestone Firestone, Tire Express or Firestone). They will receive:

- ➢ Free Tire Inspection
- ➢ Free Rotation Service (if needed).

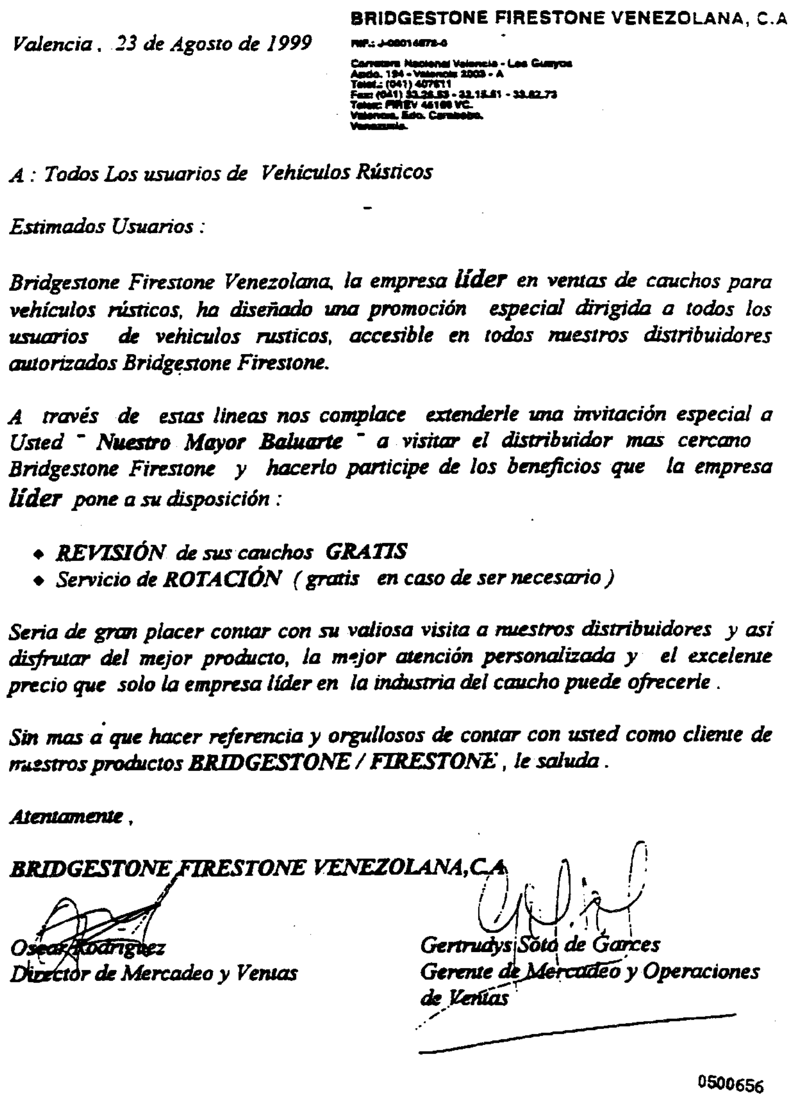
All our dealer network should know of this special promotion in order to offer the best product, the best customer service and the best price that only our company as leader of the tire business in Venezuela can give.

The benefits that we will obtain from this promotion will be reflected in an increased traffic of customers to our dealers thus increasing BFVZ sales.

Counting on you for the fulfillment of this promotion, we remain,

Sincerely,

O. Rodriguez	G. Soto de Garces
Marketing & Sales Director	Marketing and Sales Operations Mgr.



BRIDGESTONE FIRESTONE VENEZOLANA, C.A
RIF.: J-00014878-0
Carretera Nacional Valencia - Los Guayos
Apdo. 194 - Valencia 2003 - A
Telef.: (041) 407611
Fax: (041) 33.26.53 - 32.15.61 - 33.82.73
Telex: FIREV 46186 VC.
Valencia, Edo. Carabobo.
Venezuela.

Valencia , 23 de Agosto de 1999

A : Todos Los usuarios de Vehiculos Rústicos

Estimados Usuarios :

Bridgestone Firestone Venezolana, la empresa ***líder*** *en ventas de cauchos para vehículos rústicos, ha diseñado una promoción especial dirigida a todos los usuarios de vehiculos rusticos, accesible en todos nuestros distribuidores autorizados Bridgestone Firestone.*

A través de estas lineas nos complace extenderle una invitación especial a Usted " ***Nuestro Mayor Baluarte*** *" a visitar el distribuidor mas cercano Bridgestone Firestone y hacerlo participe de los beneficios que la empresa* ***líder*** *pone a su disposición :*

- ***REVISIÓN*** *de sus cauchos* ***GRATIS***
- *Servicio de* ***ROTACIÓN*** *(gratis en caso de ser necesario)*

Seria de gran placer contar con su valiosa visita a nuestros distribuidores y así disfrutar del mejor producto, la mejor atención personalizada y el excelente precio que solo la empresa líder en la industria del caucho puede ofrecerle .

Sin mas que hacer referencia y orgullosos de contar con usted como cliente de nuestros productos ***BRIDGESTONE / FIRESTONE*** *, le saluda .*

Atentamente ,

BRIDGESTONE FIRESTONE VENEZOLANA,C.A

Oscar Rodriguez
Director de Mercadeo y Ventas

Gertrudys Soto de Garces
Gerente de Mercadeo y Operaciones de Ventas

BRIDGESTONE FIRESTONE VENEZOLANA C.A.
RIF. J-[illegible]

Carretera Nacional Valencia - Los Guayos
Apdo. 134 - Valencia 2003 - A
E-Mail: [illegible] net.ve
Telef: (041)407.811 - 33.34 70
Fax (041) 38.55.77 - 32.15.51 - 33.82.73
Valencia, Edo. Carabobo
Venezuela

Valencia, August 23, 1999

Free Translation

TO: Owners of Light Truck Vehicles

Dear Customer:

Bridgestone Firestone Venezolana, the Venezuelan leader in sales of light truck and sports Utility tires is launching a special promotion for all customers, available at all our authorized Bridgestone Firestone dealers.

We will like to extend a special invitation to you, our special customer, to visit your nearest BFVZ dealer and take advantage of the benefits of this promotion:

- Free Tire Inspection.
- Free Rotation Service (if needed).

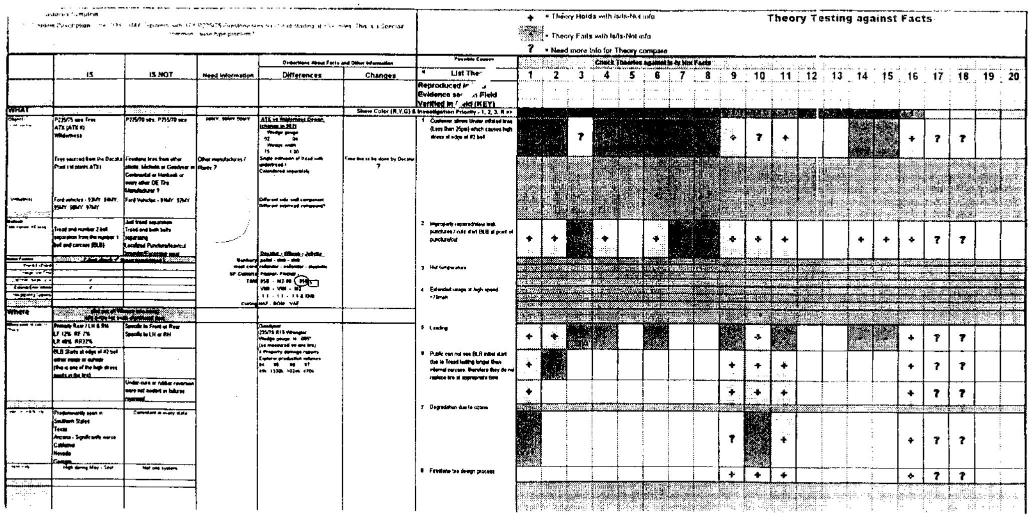
It will be a pleasure to count with your visit to one of our dealers so that you can enjoy the best product, the best customer service and the excellent prices that only our company as leader of the tire business in Venezuela can offer you.

Looking forward to counting with you as our preferred customer, we remain,

Sincerely,
Bridgestone Firestone Venezolana C.A.
signed by:

Oscar Rodriguez	Gertrudis Soto de Garcés
Sales & Marketing Director	Marketing and Sales Operations Mgr.

PROBLEM SOLVING WORKSHEET G3D



Problem Description: [illegible] ATX P235/75 [illegible] tread starting at [illegible] miles. This is a Special [illegible] type problem?

	IS	IS NOT	Need Information	Differences	Changes
WHAT					
Object	P235/75 size Tires ATX (ATX II) Wilderness	P225/70 size, P255/70 size	[illegible]	ATX vs Wilderness Design, (shown in [illegible]) Wedge gauge .92 .06 Wedge width .75 1.00	
	Tires sourced from the Decatur Plant (all plants ATX)	Firestone tires from other plants, Michelin or Goodyear or Continental or Hankook or every other OE Tire Manufacturer ?	Other manufactures / Plants ?	Single extrusion of tread with undertread / Calendered separately	Time line to be done by Decatur ?
Vehicles	Ford vehicles - 93MY 94MY, 95MY 96MY 97MY	Ford Vehicles - 91MY 92MY		Different side wall component Different undertread component?	
Defect	Tread and number 2 belt separation from the number 1 belt and carcass (BLB)	Just tread separation Tread and both belts separating Localized Puncture/tear/cut Impacts/Excessive wear		Decatur - Wilson - Joliette Banbury: pellet - slab - slab [illegible]: calendar - calendar - [illegible] SP Calendar: Frames - Frames TAM: 058 - M2.00 - [illegible] [illegible] Curing: [illegible]	
	✓				
	✓				
Where	[illegible]				
	Primarily Rear / LH & RH LF 12% RF 7% LR 48% RR32%	Specific to Front or Rear Specific to LH or RH		Goodyear 235/75 R15 Wrangler Wedge gauge is .085" (as measured on one tire) & Property damage reports Explorer production volumes 94 95 96 97 49k 1330k 1024k 470k	
	BLB Starts at edge of #2 belt either inside or outside (this is one of the high stress points in the tire)				
		Under-cure or rubber reversion were not evident in failures reported			
	Predominantly seen in Southern States Texas Arizona - Significantly worse California Nevada Georgia	Consistent in every state			
	High during May - Sept	Not one system			

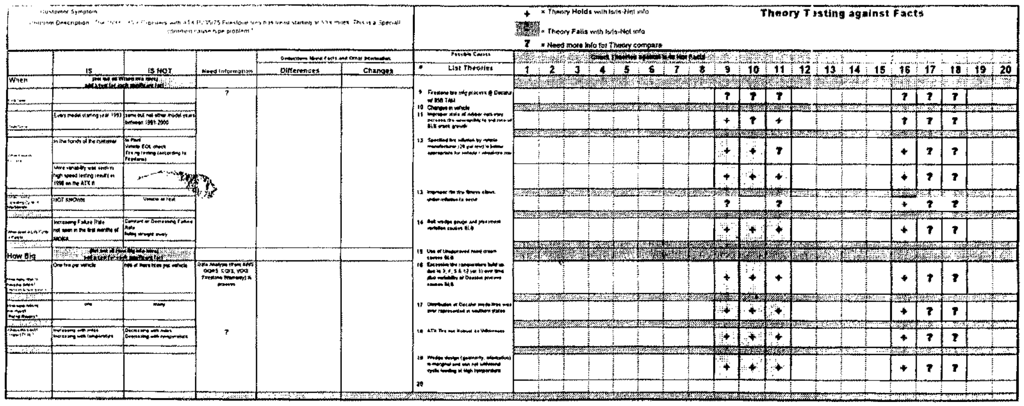
Theory Testing against Facts

- + = Theory Holds with Is/Is-Not info
- ▨ = Theory Fails with Is/Is-Not info
- ? = Need more Info for Theory compare

Show Color (R,Y,G) & Investigation Priority - 1, 2, 3, R =>

Possible Causes # List Theories	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
Reproduced in [illegible] Evidence se[illegible] in Field Verified in Field (KEY)																				
1 Customer allows Under inflated tires (Less than 26psi) which causes high stress at edge of #2 belt	▨	▨	?	▨	▨	▨	▨	▨	+	?	+			▨	▨	+	?	?		
2 Improperly repaired/slow leak punctures / cuts start BLB at point of puncture/cut	+	+	▨	+		+	▨	▨	+	+	+			+	+	+	?	?		
3 Hot temperature	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨
4 Extended usage at high speed >70mph	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨
5 Loading	+	+	▨	▨		▨			▨	+	▨			▨	▨	+	?	?		
6 Public can not see BLB initial start due to Tread lasting longer than internal carcass, therefore they do not replace tire at appropriate time	+	▨							+	+	+					+	?	?		
	+								+	+	+					+	?	?		
7 Degradation due to ozone	▨								?	▨	+					+	?	?		
8 Firestone tire design process									+	+	+					+	?	?		

PROBLEM SOLVING WORKSHEET G8D



Customer Symptom

[illegible] Description: [illegible] with ATX [illegible] Firestone tires [illegible] starting at [illegible] miles. This is a Special/common cause type problem?

	IS	IS NOT	Need Information	Differences	Changes
When	(list out all When info here) add a row for each significant fact				
[illegible]			?		
[illegible]	Every model starting year 1993	some but not other model years between 1991-2000			
[illegible]	In the hands of the customer	In Plant Vehicle EOL check Tire rig testing (according to Firestone)			
	More variability was seen in high speed testing results in 1998 on the ATX II				
[illegible]	NOT KNOWN	[illegible]			
[illegible]	Increasing Failure Rate not seen in the first months of [illegible]	Constant or Decreasing Failure Rate failing straight away			
How Big	(list out all How Big info here) add a row for each significant fact				
[illegible]	One tire per vehicle	[illegible] of more tires per vehicle	Data Analysis (from [illegible], [illegible], Firestone Warranty) in process		
[illegible]	one	many			
[illegible]	Increasing with miles Increasing with temperature	Decreasing with miles Decreasing with temperature	?		

Theory Testing against Facts

+ = Theory Holds with Is/Is-Not info

▨ = Theory Fails with Is/Is-Not info

? = Need more info for Theory compare

Possible Causes		Check Theories against Is/Is Not Facts																			
#	List Theories	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
9	Firestone tire mfg process @ Decatur [illegible]									?	?	?					?	?	?		
10	Changes in vehicle	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨
11	Improper state of rubber [illegible] increases the susceptibility to and rate of BLS crack growth									+	?	+					?	?	?		
12	Specified tire inflation by vehicle manufacturer (26 psi) is below appropriate for vehicle [illegible]									+	+	?					+	?	?		
										+	+	+					+	?	?		
13	Improper [illegible] to occur									?		?					+	?	?		
14	Belt wedge gauge and placement variation causes BLS									+	+	+					+	?	?		
15	Use of Unapproved [illegible] cream causes BLS	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨
16	Excessive tire temperature build up due to [illegible] over time plus variability of Decatur process causes BLS									+	+	+					+	?	?		
17	Distribution of Decatur made tires was over represented in southern states									+	+	+					+	?	?		
18	ATX Tire not Robust [illegible]									+	+	+					+	?	?		
19	Wedge design (geometry, lamination) is marginal and can not withstand cyclic loading at high temperature									+	+	+					+	?	?		
20																					

Rauner, Allan (A.H.)

From: Rauner, Allan (A.H.)
Sent: Thursday, August 12, 1999 9:22 AM
To: 'schafrickstu@bfusa.com'
Subject: FW: FOV Explorer Tires

Info

Allan Rauner
Explorer OPD Chassis
Tire and Wheel Engineer
313-59-42821
313-390-6744 (fax)
ARAUNER@FORD.COM
33 months and counting

-----Original Message-----
From: CMARON VENEZUEL [mailto:CMARON VENEZUEL]
Sent: Wednesday, August 11, 1999 4:16 PM
To: arauner@mail.ford.com; ehsueh@mail.ford.com; jkuznick@drbn005.dearborn.ford.com; jboerger@drbn006.dearborn.ford.com
Cc: adasilva@drbn007.dearborn.ford.com; rmoreno6@drbn007.dearborn.ford.com; oromero@drbn007.dearborn.ford.com
Subject: FOV Explorer Tires

The issue we commented weeks ago with Explorer tires failure continues. Tires blow out at high speeds. Loss of tread is experienced sometimes.
Accidents continue ocurring, the rumor is on the street already and the media could get aware anytime.
We have made exhaustive investigations with Firestone experts and have found nothing. Firestone claims that any tire could have tread separation due to aging, damage, wear or high speed/low pressure condition.
Last week, a team of Firestone came down from US and made a tour across dealers in several cities. Their report will be out tomorrow. Their preliminary conclusions are.
-There is no sign of any manufacturing defect of the tires.
-Objects as nails, glass particles and others were found on the tread that could lead to steel corrosion and eventually tread separation.
-Most of the tires were underinflated on the range of 20 to 24 psi. Some of them as low as 11 psi.

We ask: These are facts of Venezuelan market. Why only Explorers suffer accidents?
We are not to stand this situation anymore. We want to do a campaign of change of tires to 100% Explorers in Service. The problem is that we dont know which tire to install because we dont know the cause of failure.
We need your help on the following:
- Any comments/recommendation you could give us regarding this issue.
- Part numbers of alternate tires already approved for Explorer that we could use. Preferible Good Year tires.
- Is there any kind if sign that this issue exists in the US or other market?
- Is there anything in the vehicle that you think is causing the failure?

We would like to have a teleconference on this issue ASAP. Can it be tomorrow afternoon? Eva, please advise.
Thanks for your attention and prompt response

Carlos Maron
FOV Local Development Mgr.
FORDNET:7650-405
PH:58-41-406405 FAX:58-41-406311

"Imagination is more
important than
knowledge"
Albert Einstein

Rauner, Allan (A.H.)

From: Behr, John [BehrJohn@bfusa.com]
Sent: Friday, August 20, 1999 5:00 PM
To: 'Rauner, Allan (A.H.)'
Cc: Schafrick, Stuart; Behr, John
Subject: RE: Urgent Request

Allan, below are the volumes for the P255/70R16 Wilderness AT OWL that was exported from North America to Venezuela. I assume these tires were supplied to Ford-Venezuela by Bridgestone/Firestone-Venezuela, but I am not certain that every single one of them was fitted as OE. Some may have been used in the replacement market.

1996 -	5,027
1997 -	33,693
1998 -	18,275
1999 -	0
Total -	56,995

I did not ask our people for shipments on the P235/75R15, but I don't believe very many, if any, of that size was shipped to Venezuela.

John Behr

-----Original Message-----
From: Rauner, Allan (A.H.) [mailto:arauner@ford.com]
Sent: Thursday, August 19, 1999 7:51 AM
To: 'behrjohn@bfusa.com'
Cc: 'schafrickstu@bfusa.com'
Subject: Urgent Request

John,

Can you get the count, by year (ie. 95,96,97,98,99), of US built P235/75R15 (ST381J) and P255/70R16 (ST369J) that have been shipped to FoV for Explorers built in Venezuela. I need this count by COB today (8-19). I'm not sure if P235's were ever sent but I know P255's were.

This whole Venezuela thing is blowing up and a 14D has been requested. I recall is going to happen.

Stu, I need to get that report TODAY from your SA Design group. FAX me a copy to 390-6744 this morning.

Thanks,

Allan Rauner
Explorer OPD Chassis
Tire and Wheel Engineer
313-59-42821
313-390-6744 (fax)
ARAUNER@FORD.COM
33 months and counting

Rauner, Allan (A.H.)

From: Rauner, Allan (A.H.)
Sent: Friday, August 20, 1999 12:26 PM
To: Romero, Oscar (O.)
Cc: Dehne, Troy (T.L.); Kuznicki, Joseph (J.L.); Rauner, Allan (A.H.)
Subject: FW: Tire for South America

Goodyear just finished retasting this tire noted below and has passed as an "S" (112mph) tire. Goodyear is in the process of restamping the tire as an "S" rated tire. The tire actually did better in the high speed "S" rating testing than the Firestone tire.
This would be the best tire choice to change to for 16" Venezuela Explorers because of its new speed rating and its tougher South America construction. I don't know whether Goodyear will give the tire a new part number when they restamp the speed rating but I don't think they will because nothing changed in the tire construction.

As per my previous, you can find out how the tire is performing on SA PN96 vehicles.

Thanks,

Allan Rauner
Explorer OPD Chassis
Tire and Wheel Engineer
313-59-42821
313-390-6744 (fax)
ARAUNER@FORD.COM
33 months and counting

-----Original Message-----
From: MIKE PULTE JR [mailto:mike_pulte@goodyear.com]
Sent: Thursday, August 19, 1999 10:16 AM
To: arauner@mail.ford.com
Subject: Tire for South America

Allan, I discussed your tire needs with our Ford Engineering team in Akron.
They suggest using the PN96 P255/70R16 Wrangler RT/S 6D0220C F85A-1508-MA (OWL) -NA (BSL) on the Explorer in South America. This is a special South American "P" metric tire. It's construction is specifically designed for that market (much more rugged than an North American P-metric tire). The Tire was originally released as a "R" speed rating but tests show that the tire can be easily marked a "S" speed rating. This might be the solution you are looking for.

1996/97 Explorer / Mountaineer P255/70R16 Tire Separation in GCC and Malaysia

Draft of 7/08/99

1. **PROBLEM DESCRIPTION** (what/when/extent)

A. While driving vehicle, the tire tread separated (belt edge separation) from the main carcass of the tire. The tire failure is discovered when the driver hears the tire tread hitting the wheel house or the tire goes flat.

Incidences to date:

18 incidences have occurred in Saudi Arabia, Oman, and Qatar combined

2 incidences have occurred in Malaysia (15" tire)

All of these failures have been tire tread separation, all on '96 and '97 vehicles, all at mileages between 15,200 km and 55,000 km (9,500 - 34,000 miles).

B. Firestone P255/70R16 A/T ROWL tire, part # F57A-1508-JA, construction code ST369J, date codes on tires built between 10/25/95 and 2/19/97. This tire size and construction is a regular production option on U.S. models and is the standard size tire on almost every exported Explorer/Mountaineer except the base model going to Japan and Korea.

C. Vehicles Affected:

Model Year (s)	Vehicle Lines	Vehicle Volume	Variants	Other Limiting Factors
GCC				
1996	Explorer	2109	4X4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
1997	Expl./Moun..	1821	4X4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
1998	Expl./Moun.	1231	4X4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
1999	Expl./Moun.	TBD	4X4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
		5161		
Malaysia				
1996	Explorer	0	4x4, 4 dr, 4.0L, Auto	P235/75R15 A/T ROWL tire
1997	Explorer	109	4x4, 4 dr, 4.0L, Auto	P235/75R15 A/T ROWL tire
1998	Explorer	<40	4x4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
1999	Explorer	<80	4x4, 4 dr, 4.0L, Auto	P255/70R16 A/T ROWL tire
		229		

D. Markets Affected: Malaysia and GCC (Bahrain, Saudi Arabia, Oman, Qatar, Yemen, Jordan, Kuwait, Lebanon, Syria and United Arab Emirates).

E. CPSC Codes: 04.04.02.

2. DEFINE ROOT CAUSE

The root cause of the tire failures was determined to be tread separation from the tire carcass caused by one or more of the following contributing factors:

A. Low inflation operating situation - causing internal tire damage resulting in tread separation.

Improper repair

Tire repairs being done using unapproved rope type plugs. This type of repairs leak air, unbeknownst to the customer.

Unintentional under-inflation condition (puncture, other leak)

Customer gets slow leak from puncture and drive on under-inflated tire.

Valve stem leakage due to customer not replacing cap (50% occurrence)

Continued / Repeated use while under-inflated (after off-road usage)

Customers let air out of tires to drive in the desert, then drive back to a gas station at high speed with under-inflated tires.

FoV recommends a lower tire pressure than we do (to improve skate) and vehicle is driven vehicle at Vmax for long distances with these "under-inflated" tires.

B. Extended / Repeated use at high speed in high ambient temperatures

Tires are speed rated to run at rated speed (ie, 112 mph) for only a short period of time (20-30 minutes) before the tire starts to fail internally. Our customers in these countries are driving the Explorer as fast as 106 mph for hours, possibly several times a week, possibly every week of the year, for 3-4 years. Running the tires for long periods at high speeds have an accumulative affect on destroying the tire.

C. Extended / Repeated use at overloaded conditions in high ambient temperatures

Third row seat added to GCC sold vehicles can put the vehicle rear gross axle weight (RGAWR) above the allowable designed by Ford. This puts added loading into the tire, thus generating more heat in addition to the high ambient operating conditions and possible high vehicle speeds. These all add up to speeding up the destruction to the tire internally.

D. Fatigue failure accelerated by high temperatures

The tire rubber internal bonds start to break down when exposed to high temperatures for extended periods of time. This in conjunction with dynamic cycling (driving at high speeds) (which imparts additional heat into the rubber) breaks more of these bonds between the rubber molecules and between the rubber and the steel belts. This weakening/breaking of the bonds between the steel belt and the rubber is where the tire tread separation starts and "unzips" the tread.

E. Fatigue failure accelerated by ozone exposure (in areas near oil fields, eastern Gulf cities)

The high ozone levels near oil fields or oil refineries chemically attacks the rubber and breaks down the bonds linking the rubber molecules. We see this condition on the outer upper sidewall and shoulder area of the tires as cracks. These cracks can cause tread separation or sidewall bulges.

F. Please check the applicable item(s) in each category:

- Type: X Design ☐ Manufacturing ☐ Vehicle Assembly

  X Other (Specify - Customer - air pressure or Road Hazard -Puncture)

- System: ☐ Body X Chassis ☐ Cooling ☐ Fuel ☐ Electrical ☐ Engine

  ☐ Glass ☐ Restraints ☐ Transmission/Axle

  X Vehicle Label/Publications ☐ Emissions Control

  ☐ OBD X Other (Field repair procedures)

- Symptom: ☐ Brake Control ☐ Emission Compliance

  ☐ Other Regulatory Compliance ☐ Driveability/No Start

  ☐ Engine Speed Control/Unexpected Movement ☐ Fire

  X Steering Control ☐ Occupant Restraint X Personal Injury

  ☐ Visibility X Warranty Avoidance /Customer Satisfaction

  X Other (Vehicle damage)

3. PROBLEM INVESTIGATION/VERIFICATION DATA

A. Lab tests -

Running Special High Speed Testing at Reduced Pressures on:

The current 16" tire, severe duty 16" tire for Australia, H-rated tire for EAO, and 6 competitive vehicle tires (Dunlop, Bridgestone, Yokohama, Goodyear, and Michelin) that are sold in the GCC countries. The findings are that all the tires failed at about the same interval for the same speed rated tire. The only exception is the Dunlop tire that ran an additional 2 speed steps as if the tire was really an H-rated tire instead of an S-rated as labeled.

B. Vehicle tests - None

C. Plant/supplier reports - Supplier (Bridgestone/Firestone of Japan) has been contacted in Japan for Malaysia incidents, and U.S. office has been contacted on GCC incidents. Ford Explorer OPD Engineering has been contacted on all three region incidences.

D. Quality Indicator System - 2 CQIS reports have been received on Malaysia incidents.

E. Field reports - 18 from GCC
2 from Malaysia

F. Parts sales — Tires are not sold thru Ford dealers. Therefore no service parts count is available on problem tires.

G. Number of accidents/fines and injuries: 18 accidents in GCC
7 fatalities, 8 minor injuries, 2 unknown injury
2 incidences, no reported injuries in Malaysia.

4. Actions Taken in Production; Interim (Containment) and/or Permanent

A. Corrective actions – None at this time.

B. Notification – None at this time.

C. Provide WERS alert number - None at this time.

D. Component batch issues – None at this time.

5. VERIFY EFFECTIVENESS OF CORRECTIVE ACTIONS

A. A. No corrective action taken yet.

6. ESTIMATED PRODUCTION AND PROBLEM STATISTICS (MAGNITUDE OF CONCERN)

A. Production Involved

VEHICLES AFFECTED (BY MODEL AND MODEL YEAR)	ASSEMBLY PLANTS* (INCLUDING KNOCK DOWN OPERATIONS)	VEHICLE PRODUCTION DATES		POTENTIALLY AFFECTED UNITS	
		FROM	UP TO AND INCLUDING	NUMBER OF UNITS	ESTIMATED PERCENTAGE OF VEHICLES THAT CONTAIN THE CONDITION
1996/98 Explorer / Mountaineer	LAP	8/1/95	7/30/98	5390	N/A %
1996/99 Explorer	SLAP	8/1/95	7/30/99	0	0 %
1999 Explorer / Mountaineer	LAP	8/1/98	7/30/99	TBD	N/A %

B. Melanie Gumz of WDMO (GCC) and Diana Glass from Q&PL New Markets (Malaysia)

7. AFTERMARKET PARTS

A. Released for Service: part is released for service but Ford does not stock any tires for service.

B. Tires are not stocked by depot or by Ford dealers. Firestone must determine whether they want to purge their inventory of tires at their distributor and tire stores in these export regions.

8. ASSESSMENT OF EFFECT ON VEHICLE OPERATION

This particular tire failure has resulted in customers losing control of their vehicles with reported roll over conditions, however, we don't have definite information on the actual cause of the accidents.

Roll over conditions are a result of the vehicle going off the road into soft soil conditions, from changing road coefficients of friction (ie, wet to dry) or when the wheel digs into the pavement or ground and the vehicle rolls.

9. DESCRIPTION OF CONCERN SOLUTION AND PARTS REQUIREMENTS (FIELD SERVICE ACTIONS)

Short Term Actions:

A. **PRIME** - Have the dealers replace all the tires on every Explorer/Mountaineer after 20,000 miles (32,000 km) or 18 months after the build date (not sold date) (whichever is shorter) with the carryover Firestone Wilderness P255/70R16 A/T tires. This will assure that tires have not been in the field long enough to experience these heat related failures.

B. Same as above but have the dealers replace the tires with our "Special Service" Firestone Wilderness P255/70R16 A/T tire as they become available. We do not have enough of these tires in the GCC region, and Firestone is capacity constrained at this time to be able to support the GCC region with enough tires (~21,000 needed) for this potential action.

C. Explorer OPD Chassis Engrg. is working on proving out 2 tires that the GCC markets have recommend for their conditions. It will take Engineering 2-3 weeks to prove out these 2 tires (Goodyear Wrangler RT/S, and Bridgestone Dueler AT) are safe for the vehicle before we recommend fitment to the vehicle as a dealer fix.

Long Term Actions:

A. No long term prime action has been assessed yet.

B. Test processes, plant complexity, market wants and other factors will be thoroughly considered in developing a long term action.

-A test procedure needs to be developed by RVT to access one tire over another for this harsh operating environment.

-Assembly plant complexity needs to be addressed (LAP has no room for another tire)

-Market wants need to be addressed (GCC region does not want a Firestone tire)

-Should all Ford trucks investigate the capabilities of the tires being exported to GCC region.

-U152 and all other SUV's should have Low Tire Pressure Warning systems fitted when shipped to GCC region.

Rauner, Allan (A.H.)

From: Jerry Metters [jmetters@gw.ford.com]
Sent: Friday, June 25, 1999 3:09 PM
To: arauner@mail.ford.com
Cc: Bob Veres; jmetters@gw.ford.com; jjuronoc@gw.ford.com
Subject: RE: Tires for Export to GCC

Heat does affect tires, but not in the ways you are alluding to in your note. Heat has the following impact:

1. Higher temperatures tend to cause tires to continue to cure faster than milder temperatures. As tires continue to cure the modulus of the rubber will change and properties that are controlled by the modulus will change somewhat. This is a slow process. In the U.S. it may take 5 or 6 years for the tire to change where it may be unacceptable.

2. If tires are loaded and stationary (like on a vehicle parked) at high temperatures (>140 deg. F) heat set flatspotting may result. This is where the polyester body cord can take a permanent set and the compound can take a set and any nylon overlay (H rated or above) can take a set and cause a permanent flat spot. If these flat spots are occuring each time the vehicle is parked, the effect of force variation may be diminished over time.

These are the generally known effects of heat on tires.

Sincerely,
Jerry Metters
Ford Motor Company, Suspension Systems
Building #5, Room 3233, Ph. 313 845-8160
*** Forwarding note from ARAUNER --FORDNA1 06/14/99 15:21 ***
To: JMETTERS--FORDMAIL Metters, Jerry (J.
cc: ARAUNER --FORDNA1 Rauner, Allan (A.H ESTEHOUW--FORDNA1 Stehouwer, Elizabe

From: Rauner, Allan (A.H.)
Subject: RE: Tires for Export to GCC

You mention "A" temperature rating for tires going to GCC.

You also mention that you are not aware of heat aging of tires.

Then please explain to me why there are 3 requirements in the SDS that speak to elevated temperatures; tire flat spotting, paint repair oven and spare tire max temperature.

I understand the tire flat spotting and paint repair oven requirement pertains to vehicle vibration and thumping caused by flat spotted tires, but NOT the spare tire maximum temperature.

Does something happen to tires that see high temperatures for extended periods of time. Why the spare tire temperature requirement?

These vehicles in Saudi Arabia see ambient temperatures in excess of 110-120F for months at a time, with asphalt temperatures in excess of 150F (we are getting the actual asphalt temps in Saudi in June at 2-4pm in the afternoon - as we speak). We will share these temperatures with you when Firestone returns.

Could these tires be reverting back to a "green state" or "uncured state" after being exposed to these type temperatures for 2 to 3 years, thus causing tire tread separation?

Thanks for any insite you can offer.

Allan Rauner
Explorer OPD Chassis

Tire and Wheel Engineer
313-59-42821
313-390-6744 (fax)
ARAUNER@FORD.COM
35 months and counting

-----Original Message-----
From: Jerry Metters [mailto:jmetters@gw.ford.com]
Sent: Friday, May 14, 1999 3:57 PM
To: arauner@mail.ford.com
Cc: jmetters@gw.ford.com; Bob Veres
Subject: Tires for Export Countries

The only thing special that we have done in the past is to insure that only "A" temperature rated tires are sent to the Gulf Coast countries. We have also sent speed rated tires because of the high speeds they drive in those countries. I am aware that Michelin developed a special line of tires to be used in the Middle East a couple of years ago. They claimed that normal tire constructions designed for North America would wear for so long in the Middle East climate that carcass failures would occur before the tread would wear out. I am not aware that heat aging plays a part in this. From Michelins description I thought the carcass failures are normal high mileage fatigue failures.

We have not initiated any DVP&R actions to address this at this time for tires going to the Gulf Coast countries. Certainly if tires are run underinflated for long periods of time the risk of failure is high. In addition, the Rubber Manufacturers Association (RMA) in the U.S. will only approve inside patches for repairing punctures. Do you know how they repair tires?

If it is determined that additional requirements are needed in GCCs we will take action to include them in the Tire ES and SDS. If you want to talk more about it give me a call early next week.

Sincerely,
Jerry Metters
Ford Motor Company, Suspension Systems
Building #5, Room 3233, Ph. 313 845-8160
*** Forwarding note from ARAUNER --FORDNA1 05/13/99 10:58 ***
To: RVERES --FORDMAIL Veres, Robert (R.E JMETTERS--FORDMAIL Metters, Jerry (J.
cc: ARAUNER --FORDNA1 Rauner, Allan (A.H

From: Rauner, Allan (A.H.)
Subject: Tires for Export Countries

Jerry/Bob:

Does AVT (RVT) has any advice or direction or an SDS on what a tire construction should look like for Export to countries other than Europe.

We are having numerous tread separations in extremely hot climates like GCC, Venezuela, and Malaysia. All these countries except Malaysia have unlimited speed limits. We are getting these failures on vehicles between 10,000 and 35,000 miles, and all 1996 and 1997 models that have 2 to 3 years on the road. There seems like some sort of heat aging is going on.

We know we are getting some of these failures from underinflated conditions and poor patching or repairs (fibre plugs, no patches).

I cannot contribute all the tire failures to underinflation at this time. This condition might be the root cause but I can't rule out some sort of heat aging.

Michelin told Elizabeth Stehouwer that they would NOT allow Ford to send one of their NAAO constructed tires for U152 to GCC. They said they would want a complete ground up tire construction for GCC type countries. They said they would want to build a tire with rayon cord instead of nylon or polyester?

What does Michelin and maybe AVT know about what a tire design should look like for these hot, high speed, conditions that we in the VC's and the tire suppliers should know before we export a tire to these countries.

I need your help. The CCRG wants to know what we need to do (as a company) to protect for these failures in these export countries in the future.

Thanks.

Allan Rauner
Explorer OPD Chassis
Tire and Wheel Engineer
313-59-42821
313-390-6744 (fax)
ARAUNER@FORD.COM
36 months and counting

Rauner, Allan (A.H.)

From: Oscar Romero [oromero@gw.ford.com]
Sent: Wednesday, May 19, 1999 3:41 PM
To: arauner@mail.ford.com
Subject: RE: [Fwd: Venezuela Knock Down Kits]

MY 96 Explorer assembled in FoV: 4.769 units
MY 97 Explorer assembled in Fov: 12.435 units
My 98 " " " " : 5.403 units
These units where sold in Colombia and Venezuela.

F, V
'96 4769
'97 12435
'98 5403
22607
'95 1500
24,107

Regards.
Oscar Romero
FOV Vehicle Standards, Validation and Service Eng.
Tlf: Ford Dialnet 9-1-7650-145 Fax: 9-1-7650-311
*** Forwarding note from ARAUNER --FORDNA1 05/19/99 09:56 ***
To: OROMERO --FORDMAIL Romero, Oscar (O.)

From: Rauner, Allan (A.H.)
Subject: RE: [Fwd: Venezuela Knock Down Kits]

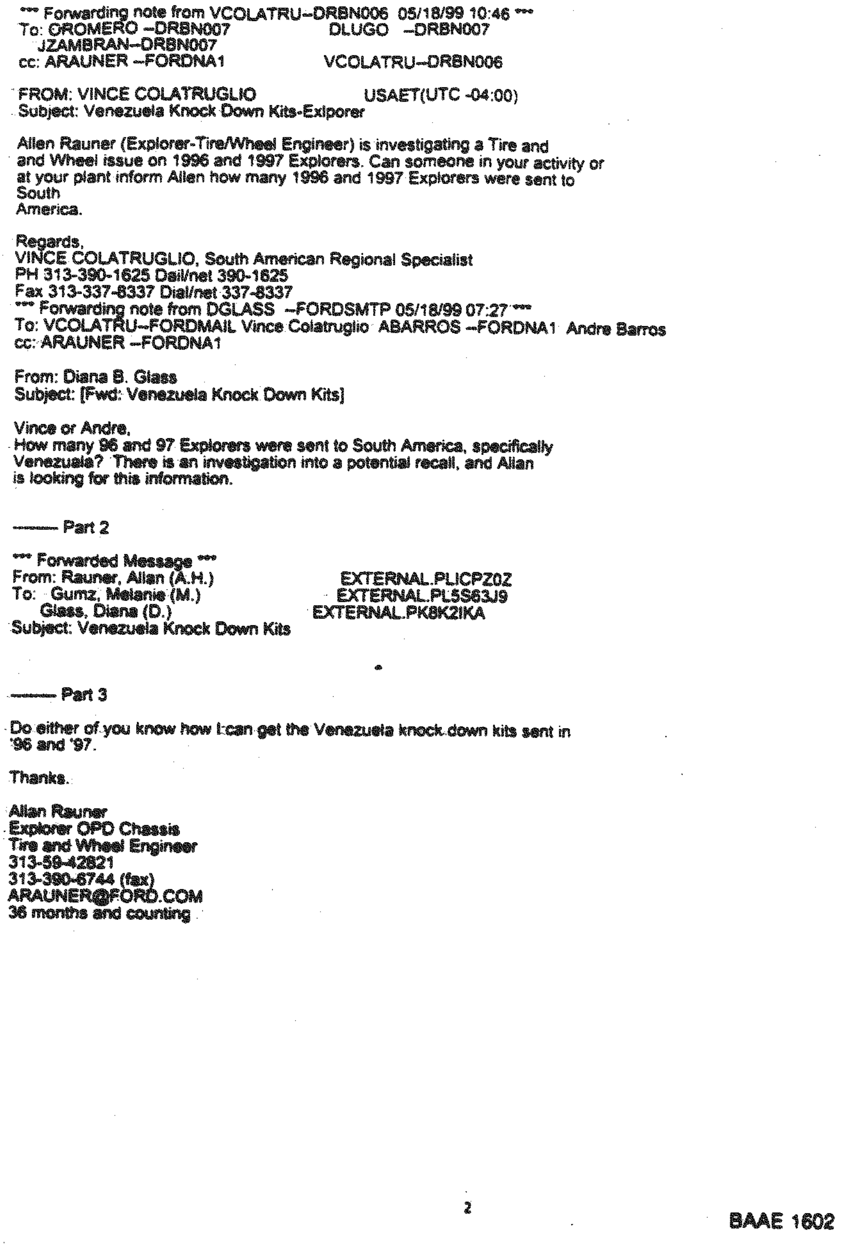
You import knock down kits for Explorers. I need the number of '96 and '97
kits you have sold.

Allan Rauner
Explorer OPD Chassis
Tire and Wheel Engineer
313-59-42821
313-390-6744 (fax)
ARAUNER@FORD.COM
36 months and counting

-----Original Message-----
From: Oscar Romero [mailto:oromero@gw.ford.com]
Sent: Wednesday, May 19, 1999 9:00 AM
To: vcolatru@gw.ford.com
Cc: dlugo@gw.ford.com; adasilva@gw.ford.com; arauner@mail.ford.com;
jzambran@gw.ford.com
Subject: [Fwd: Venezuela Knock Down Kits]

We received aproximately 1500 units in Colombia in 1995.
We build the Explorer locally, so we do not import.
As for tire problems, we are analizying a recall on a local tire issue that
see
ms to apply to imported tires.
These tires blow up or loose there tread when car is driven continously
above
140 km/hr. The situation has become critical in the Venezuelan Guiana where
customers will drive their Explorer for at least 2 hours continuosly at
speeds
close to 160 km/hr. Tire life expectancy is averaged at 40.000 km, but we
have
seen cases under 20.000 km.
We checked with Firestone and they informed us that at bench test, full load
ca
pacity, 160 km/hr, the local tires will last no more then 24 minutes, and
impor
ts no more then 8 minutes.
We are also analyzing F150, which uses same tire.
Do you need additional info?

Regards,
Oscar Romero
FOV Vehicle Standards, Validation and Service Eng.
Tlf: Ford Dialnet 9-1-7650-145 Fax: 9-1-7650-311



*** Forwarding note from VCOLATRU--DRBN006 05/18/99 10:46 ***
To: OROMERO --DRBN007 DLUGO --DRBN007
JZAMBRAN--DRBN007
cc: ARAUNER --FORDNA1 VCOLATRU--DRBN006

FROM: VINCE COLATRUGLIO USAET(UTC -04:00)
Subject: Venezuela Knock Down Kits-Exlporer

Allen Rauner (Explorer-Tire/Wheel Engineer) is investigating a Tire and and Wheel issue on 1996 and 1997 Explorers. Can someone in your activity or at your plant inform Allen how many 1996 and 1997 Explorers were sent to South America.

Regards,
VINCE COLATRUGLIO, South American Regional Specialist
PH 313-390-1625 Dail/net 390-1625
Fax 313-337-8337 Dial/net 337-8337
*** Forwarding note from DGLASS --FORDSMTP 05/18/99 07:27 ***
To: VCOLATRU--FORDMAIL Vince Colatruglio ABARROS --FORDNA1 Andre Barros
cc: ARAUNER --FORDNA1

From: Diana B. Glass
Subject: [Fwd: Venezuela Knock Down Kits]

Vince or Andre,
How many 96 and 97 Explorers were sent to South America, specifically Venezuala? There is an investigation into a potential recall, and Allan is looking for this information.

——— Part 2

*** Forwarded Message ***
From: Rauner, Allan (A.H.) EXTERNAL.PLICPZ0Z
To: Gumz, Melanie (M.) EXTERNAL.PL5S63J9
Glass, Diana (D.) EXTERNAL.PK8K2IKA
Subject: Venezuela Knock Down Kits

——— Part 3

Do either of you know how I can get the Venezuela knock down kits sent in '96 and '97.

Thanks.

Allan Rauner
Explorer OPD Chassis
Tire and Wheel Engineer
313-59-42821
313-390-6744 (fax)
ARAUNER@FORD.COM
36 months and counting

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**********************************************************************
*          Note printed by WSMITH1 on 8 Apr 1999 at 12:54:02         *
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From: CMARON --DRBN007 Date and time 04/08/99 11:27:23
To: WSMITH1 --DRBN005 ARAUNER --DRBN005
ARAUNER --DRBN005
cc: ADASILVA--DRBN007 ERIVERO1--DRBN007
ONEGRON --DRBN007 RMORENO6--DRBN007

Severe DUTY TIRE

FROM: CMARON VENEZUEL(UTC -04:00)
Subject: Tire pressure
Will, we are proceeding today to release Australian shocks for all our Explorers, given that they significantly improve stability at high speeds and irregular pavement (important customer concern in Venezuela).
We have realized that if we go to Australian tires we should go only for 4DR 4x4, given that test were not completed for other applications.

In case of shocks, can we use Australian shocks in all our explorers? We have 4.0L OHV and SOHC, 2DR and 4DR, 4x2 and 4x4 in all combinations.

Allan, our road conditions allow vehicles to go Max speed for 1 hour or more. Explorer PCM is regulated for Max speed 100 mph, so, it is not as useful for us to know that a tire resists 10 min at more than 100 mph than to know if a tire can resist indefinite period of time at 100 mph.
If you have any data at 100 mph it would be useful, otherwise this info would serve you to think about reviewing tire testing procedures.
Believe me, it is pretty normal here to go at Max speed for one hour or more with addition of an ambient temperature of 105 degrees farenheit or more. You can imagine the temperature of the asphalt....

Carlos Maron
FOV Local Development Mgr.
FORDNET:7650-405
PH:58-41-406405 FAX:58-41-406311

"Imagination is more
important than
knowledge"
Albert Einstein

*** Forwarding note from ARAUNER --DRBN005 04/08/99 10:04 ***
To: CMARON --DRBN007
cc: ARAUNER --DRBN005

FROM: Allan Rauner USAET(UTC -04:00)
Subject: Tire pressure
The H-rated tire is released on only European vehicles (4 dr, 4x4, all engines that go to Europe based vehicles).

The severe duty tire is for Australia and New Zealand vehicles (4 dr, 4x4, all engines that go to Australia and New Zealand.)

The H-rated and severe duty Australian tire are certified for 4 dr, 4x4 only. They should NOT be fitted on any 2 dr models or 4dr 4x2 models. The tire does not meet our J-turn requirement with these tires on these other models, just the 4dr 4x4.

The P235 tire has always been at 26/26 psi. It was released that way for ride improvement. All the certification testing was run with this tire at 26psi, including running at Vmax for 10 minutes at 112 mph. The P255/70R16 was certified using 30/30 psi. It's Vmax test was run for 10 minutes at 112 mph at 30psi. You can't assume a tire is OK to run at a lower pressure because a different tire has a lower pressure. Each tire must pass all the testing at its own labelled tire pressure.

You would have to contact Bill Smith (WSMITH1) on your shock questions.

Regards,
Allan Rauner
313-59-42821
USFMCLBB
*** Forwarding note from CMARON --DRBN007 04/08/99 08:12 ***
To: ARAUNER --DRBN005 DKRUSINS--DRBN004
cc: MPICKET1--DRBN007 TDEHNE --DRBN005
RMORENO6--DRBN007 ERIVERO1--DRBN007
ADASILVA--DRBN007

FROM: CMARON VENEZUEL(UTC -04:00)
Subject: Tire pressure
Two questions:
What are the current applications of these tires?(We have 4.0L only, 4DR/2DR, 4x2/4x4).
What is the reason for tire 235/75R15 to have 26 PSI instead of 30PSI?
Yesterday we released Australian shocks for all our Explorers, given the considerable improvement in stability that we noticed. Now, we don't know if pur volumes can be supported (I suppose that is a low volume application, but don't know how low). Our volume is approx 25 vehicles a day (512 a month). Do you know what is Australian volume? Is there any quality/durability issue with these shocks that we should consider?
Thanks for your help.

Carlos Maron
FOV Local Development Mgr.
FORDNET:7650-405
PH:58-41-406405 FAX:58-41-406311

"Imagination is more
important than
knowledge"
Albert Einstein

*** Forwarding note from RMORENO6--DRBN007 04/07/99 16:59 ***
To: CMARON --DRBN007
cc: ADASILVA--DRBN007

FROM: Roselia Moreno VENEZUEL(UTC -04:00)
Subject: Tire pressure
Carlos,
Aqui estan las presiones de caucho que utilizan en Louisville. La presion mas baja esta en cauchos R15.

Regards,
Roselia Moreno
*** Forwarding note from DKRUSINS--DRBN004 04/07/99 13:46 ***
To: RMORENO6--DRBN007 Moreno, Roselia
cc: DKRUSINS--DRBN004

FROM: David M. Krusinski USAET(UTC -04:00)
Subject: Tire pressure

Hi Roselia,

Here is the tire pressure information that you requested. I hope this is what you are looking for.

		Front	Rear
P225	15"	30psi	35psi
P235	15"	26psi	26psi
P255	16"	30psi	30psi

If you have any questions please call me or profs me. I hope this helps you out. Take care and I will talk to you later.

DAVID M. KRUSINSKI	
Explorer PVT Engineer	Phone: 502-364-3521
Louisville Assembly Plant	Fax: 502-364-3699
e-mail: dkrusins@ford.com	Pager:1-888-962-2741

Observations from Ford of Venezuela PN96 Assessment Evaluation
September 1996

Environment/Conditions:

- Venezuela is a Country of Diversity.

  - . North coast - Semi-arid desert complete with sand dunes.
  - . Central - Andes mountain terrain with altitude/switchbacks.
  - . West coast - Sea level, high temp/humidity.
  - . South - Amazon jungle (rain forest).

- Virtually no traffic rules.

  - . No speed limits (not enforced), drive as "fast as you can".
  - . Traffic lights/signs considered like Christmas trees: interesting, pretty to look at but not taken too seriously.

- No visible "middle class", either abject poverty (a.k.a. Tijuana) or "well to do".

Vehicles:

- Median vehicle age is older, generally poorer condition than US.

- Bread & Butter transport is done with F350/450 flatbed trucks, pickups generally observed empty.

Evaluation Trip:

- 5 vehicles: PN96 4.2L 4x4 Manual, PN96 4.2L 4x4 Auto, '96 F150 5.0L 4x4 Man, '96 F150 5.0L 4x2 Auto, '96 Chevrolet 5.7L Man.

- 10 evaluators in teams of two, rotating between vehicles every 45 min. for 4 days.

- Drove 350 - 500 miles/day (10-12 hrs).

- Had to amend trip route due to Guerrilla activity along Colombian border.

- Overall PN96's were functionally superior to '96 F150/Chevy even though we were comparing V6's to V8's.

(See Vehicle Observations next page)

Observations from Ford of Venezuela PN96 Assessment Evaluation
September 1996

Vehicle #1 (Automatic 4.2L/3.55)

- Automatic transmission exhibits borderline shift business on grades; need to investigate the availability of a 3.73 or 4.10 axle ratio upgrade to increase 2nd gear operation above the threshold of IMRAC opening (2400rpm). Curb performance is marginal & GVW is projecte unacceptable for portions of VEN market & most of Colombia. Also investigate possibility of enabling 4-2 kickdown point at a higher vehicle speed (team observations based on increased shift business).

- Steering col shake/intermediate shaft looseness is beginning to appear at low mileage. Recommend installing either latest level fix or high temp grease.

- Lateral support of base vinyl seat is marginal (curvy mtn roads).

- Steering, Brakes, Handling all rated 8 or better with no issues noted.

Vehicle #2 (Manual 4.2L/3.55)

- Manual trans allows wider selection of 2nd-3rd operation on grades, with operation above the 2400 rpm threshold. Performance feel is judged acceptable at this time. Must confirm at ALVW condition for confirmation. Both Auto & Man will need to pass the 30% grade & Max GVW gradeability test. No recommendation to numerically increase axle at this time.

- Steering, Brakes, handling are all at 8 or better levels.

- No other concerns noted.

General Observations:

- Windshield Washer performance is marginal at speeds above 100 kph. Insect buildup is normal in Amazon environment, requiring frequent cleaning of windshield deposits. Seasonal requirements sometimes demand cleaning of windshield/front of car with a broom.

- Long exhaust is required in Columbia, to be aft of axle and directed away from pedestrians (45 deg rearward directed).

- Standard maintenance parts such as air cleaner elements, oil filters, etc. will need to be shipped to Venezuela Test Engineering to facilitate the proveout testing. Lockset (tailgate). Speedo Gears for LT245 (PN96 reading low by 20 kph).

Veneval.doc
10/1/1996

Craig D. Williams

GFH

Inter Office

Ford Automotive Operations
Production Purchasing
Chassis Commodity Management
QMP/Mail Drop 665

April 4, 1996

To: Ms. L. A. Klein
Ms. M. H. Machacek
Mr. M. A. Schuett

cc: Mr. B. K. Chance
Mr. G. F. Hagan
Mr. R. E. Veres

From: C. J. Hole

Subject: Potential Cost Reductions on Tires

Background

The Chassis department has identified uncompetitive prices on 5 fitments sourced with Goodyear. We have challenged Goodyear to become price competitive on these tires.

Goodyear responded by proposing engineering changes in the tire constructions which would enable them to reduce prices to a competitive level. Incorporating the changes would result in a 1996 CY savings of $.5 - $.7 million. Goodyear has high confidence in the proposals and anticipates the revised constructions will have little or no effect on customer satisfaction. The proposed changes have also been reviewed with AVT who recommends that they be pursued. As a Full Service Supplier, Goodyear has requested to self-certify and implement the proposals by August 1, 1996. A financial summary and technical descriptions of the proposals are attached.

Action Requested

We are requesting your support in the VC's to raise the issues to the necessary management level so that the proposals will be quickly reviewed and determined whether Goodyear may self-certify the changes. Alternatively, if a Ford engineering program is necessary, identification of responsibility for incorporation (VC or PVT) and expedited review is requested.

Attachments

1126 K10~~279~~

Ford Automotive Operations
Ford Motor Company
Chassis Core Purchasing

Rotunda Drive at Southfield
MD 665, GMP
P.O. Box 1587
Dearborn, Michigan 48121

January 26, 1996

Mr. Les Connolly, Director
OE Tire Marketing & Sales
The Goodyear Tire & Rubber Co.
1144 E. Market St.
Akron, OH 44316-0001

Dear Mr. Connolly:

We recognize Goodyear's concern with the fluctuations in raw material prices outlined in your letter of January 17th. However, as we discussed in our meeting last week, the material cost increases incurred at Goodyear are not consistent across the industry and, therefore, are not addressed by the material clause in our agreement.

Your request for economic relief would also further exacerbate an already uncompetitive condition with Goodyear. You will recall in the 1995 negotiations, we repeatedly indicated that the settlement would not maintain your price competitiveness. As an example, the following eight tires are now priced at a 2-5% premium from Goodyear:

Vehicle	Fitment
CDW27	P185/70R14 AS BSW
CDW27	P205/60R15 AS BSW
→ Explorer/Ranger	P235/75R15 AT OWL
F-Series/Econoline	P235/75R15 XL AS BSW
F-Series/Econoline	P235/75R15 XL AS OWL
F-Series	P235/75R15 XL AT OWL
F-Series	LT235/85R16 AS BSW
F-Series	LT235/85R16 AT BSW

The pricing level disparity between Goodyear and your competitors is a significant concern to us, and exists with your current price levels. Either an economic increase or foregoing the January 1996 contractual price reduction would obviously make the situation unacceptable.

We have a further concern that, as a result of your initial price quotes over the last year, Goodyear has been removed from consideration for several future model programs, including the 1998 UPN150, SN95, PHN131 19.5" tire, and the 1999 DEW98. Other programs may also be re-evaluated if your pricing continues to be above the market range.

copy Rich,
As I mentioned at the 1x1 recently [illegible] we are proceeding
with the TCR, Goodyear are trying to get out of their
contractual reduction of 1/1/96. No [illegible] in this letter yet.
I'll let you know what they say next

Ford is willing to work with Goodyear in the TCM process to address costs throughout the value chain, and our experience of TCM is that we can identify potential cost savings, provided we can work openly together. However, as we discussed, the results of the TCM effort will not obviate the need for Goodyear to fulfill our agreement, and partially address today's uncompetitive price issue.

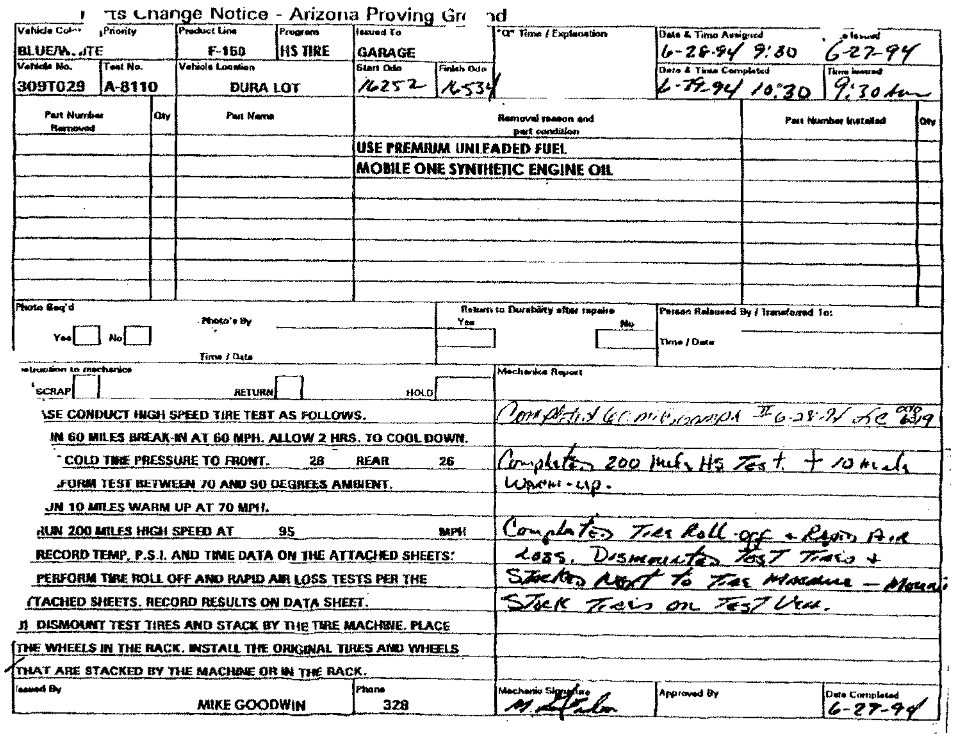
Sincerely,

C. J. Hole

/C. J. Hole, Director

cc: Mr. J. W. Barnett - Goodyear
    Mr. G. F. Hagan
    Mr. S. S. Holmes - Goodyear

CJH0126a:jp



Ts Change Notice - Arizona Proving Gr nd

Vehicle Color BLUE/W..ITE	Priority	Product Line F-150	Program HS TIRE	Issued To GARAGE	"Q" Time / Explanation	Date & Time Assigned 6-28-94 9:30	Date Issued 6-27-94
Vehicle No. 309T029	Test No. A-8110	Vehicle Location DURA LOT		Start Odo 16252	Finish Odo 16534	Date & Time Completed 6-28-94 10:30	Time Issued 9:30 am

Part Number Removed	Qty	Part Name	Removal reason and part condition	Part Number Installed	Qty
			USE PREMIUM UNLEADED FUEL		
			MOBILE ONE SYNTHETIC ENGINE OIL		

Photo Req'd Yes ☐ No ☐ Photo's By Time / Date

Return to Durability after repairs Yes ☐ No ☐

Person Released By / Transferred To:

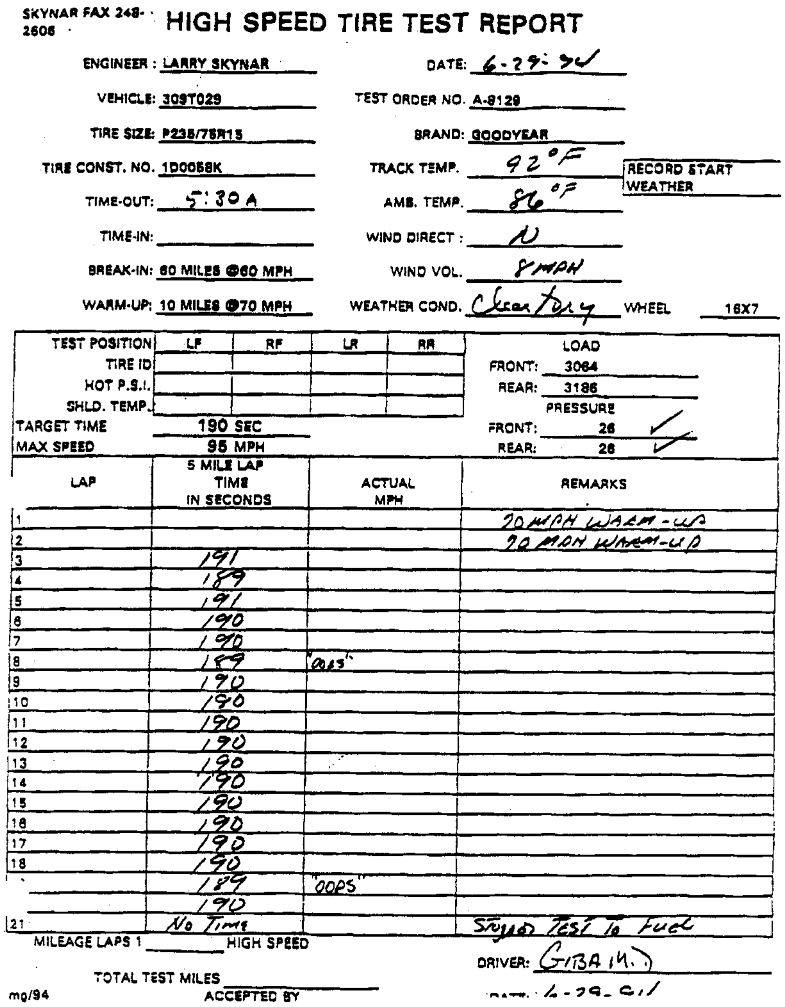
Time / Date

Instruction to mechanics

SCRAP ☐ RETURN ☐ HOLD ☐

	Mechanics Report
SE CONDUCT HIGH SPEED TIRE TEST AS FOLLOWS.	Completed 60 mi. [illegible] 6-28-94 [illegible]
IN 60 MILES BREAK-IN AT 60 MPH. ALLOW 2 HRS. TO COOL DOWN.	
COLD TIRE PRESSURE TO FRONT. 28 REAR 26	Completed 200 Miles HS Test + 10 mile
FORM TEST BETWEEN 70 AND 90 DEGREES AMBIENT.	Warm-up.
JN 10 MILES WARM UP AT 70 MPH.	
RUN 200 MILES HIGH SPEED AT 95 MPH	Completed Tire Roll-off + Rapid Air
RECORD TEMP, P.S.I. AND TIME DATA ON THE ATTACHED SHEETS.	Loss. Dismounted Test Tires +
PERFORM TIRE ROLL OFF AND RAPID AIR LOSS TESTS PER THE	Stacked next to Tire Machine - Mounted
TTACHED SHEETS. RECORD RESULTS ON DATA SHEET.	Stock Tires on Test Veh.
JI DISMOUNT TEST TIRES AND STACK BY THE TIRE MACHINE. PLACE	
THE WHEELS IN THE RACK. INSTALL THE ORIGINAL TIRES AND WHEELS	
THAT ARE STACKED BY THE MACHINE OR IN THE RACK.	

Issued By MIKE GOODWIN	Phone 328	Mechanic Signature M. [illegible]	Approved By	Date Completed 6-27-94



SKYNAR FAX 248-2606

HIGH SPEED TIRE TEST REPORT

ENGINEER : LARRY SKYNAR

DATE: 6-29-94

VEHICLE: 309T029

TEST ORDER NO. A-8129

TIRE SIZE: P235/75R15

BRAND: GOODYEAR

TIRE CONST. NO. 1D0058K

TRACK TEMP. 92°F

RECORD START WEATHER

TIME-OUT: 5:30 A

AMB. TEMP. 86°F

TIME-IN:

WIND DIRECT : N

BREAK-IN: 60 MILES @60 MPH

WIND VOL. 8 MPH

WARM-UP: 10 MILES @70 MPH

WEATHER COND. Clear Dry

WHEEL 16X7

TEST POSITION	LF	RF	LR	RR
TIRE ID				
HOT P.S.I.				
SHLD. TEMP.				

TARGET TIME 190 SEC

MAX SPEED 95 MPH

LOAD

FRONT: 3064

REAR: 3186

PRESSURE

FRONT: 26 ✓

REAR: 26 ✓

LAP	5 MILE LAP TIME IN SECONDS	ACTUAL MPH	REMARKS
1			70 MPH WARM-UP
2			70 MPH WARM-UP
3	191		
4	189		
5	191		
6	190		
7	190		
8	189	"OOPS"	
9	190		
10	190		
11	190		
12	190		
13	190		
14	190		
15	190		
16	190		
17	190		
18	190		
	189	"OOPS"	
	190		
21	No Time		Stopped Test To Fuel

MILEAGE LAPS 1 ______ HIGH SPEED

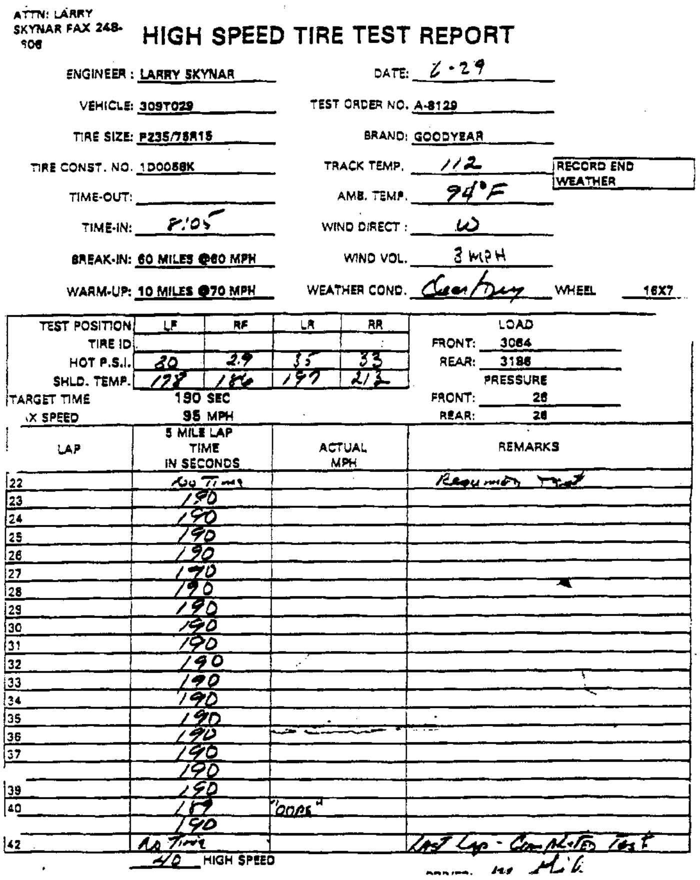
DRIVER: GIBA (M.)

TOTAL TEST MILES

mg/94

ACCEPTED BY

DATE: 6-29-94



ATTN: LARRY
SKYNAR FAX 248-
906

HIGH SPEED TIRE TEST REPORT

ENGINEER : LARRY SKYNAR
DATE: 6-29
VEHICLE: 309T029
TEST ORDER NO. A-8129
TIRE SIZE: P235/75R15
BRAND: GOODYEAR
TIRE CONST. NO. 1D0058K
TRACK TEMP. 112
RECORD END WEATHER
TIME-OUT:
AMB. TEMP. 94°F
TIME-IN: 8:05
WIND DIRECT : W
BREAK-IN: 60 MILES @60 MPH
WIND VOL. 3 MPH
WARM-UP: 10 MILES @70 MPH
WEATHER COND. Clear/Dry
WHEEL 16X7

TEST POSITION	LF	RF	LR	RR
TIRE ID				
HOT P.S.I.	30	29	35	33
SHLD. TEMP.	178	186	197	212

LOAD
FRONT: 3064
REAR: 3186
PRESSURE
FRONT: 26
REAR: 26

TARGET TIME 190 SEC
\X SPEED 95 MPH

LAP	5 MILE LAP TIME IN SECONDS	ACTUAL MPH	REMARKS
22	No Time		Resumed Test
23	190		
24	190		
25	190		
26	190		
27	170		
28	190		
29	190		
30	190		
31	190		
32	190		
33	190		
34	190		
35	190		
36	190		
37	190		
	190		
39	190		
40	189	"OOPS"	
	190		
42	No Time		Last Lap - Completed Test

40 HIGH SPEED

DRIVER:

[redacted]

TIRE TEST DATA SHEET - TEST PROCEDURE
GEN. T - 4. 04 IVD AND GEN. T. 4. 04 IVD .2.E
TIRE ROLL - OFF TEST
RAPID AIR LOSS TEST

ATTN: L. SKYNAR
FAX 248-2606

Total Vehicle Weight : Front: 3064 · Rear : 3186

Tire Size: P235/75R15 Const. No. 1D0058K Manufactor: GOODYEAR

Test Rim Part Numbers (inspected by ________ Date 6-29-94

Tire Pressure R/F 26 R/R 26 Slave SAME

Did Tire complete High Speec Test Yes X No ____

Did tire roll into wheel well? Yes ____ No X

Did wheel rim contact ground? Yes ____ No X

Location on the circle where the failure occurred. DNA

Did tire pass test? Yes X No ____

RAPID AIR LOSS

Photo of Puncture Deive. (attached) IF requied.

10 minute arm - up at 60 mph. Yes X No ____

Rapid loss of Air? Yes X No ____

Was there evidence of air escaping from tire after stop. Yes ____ No X

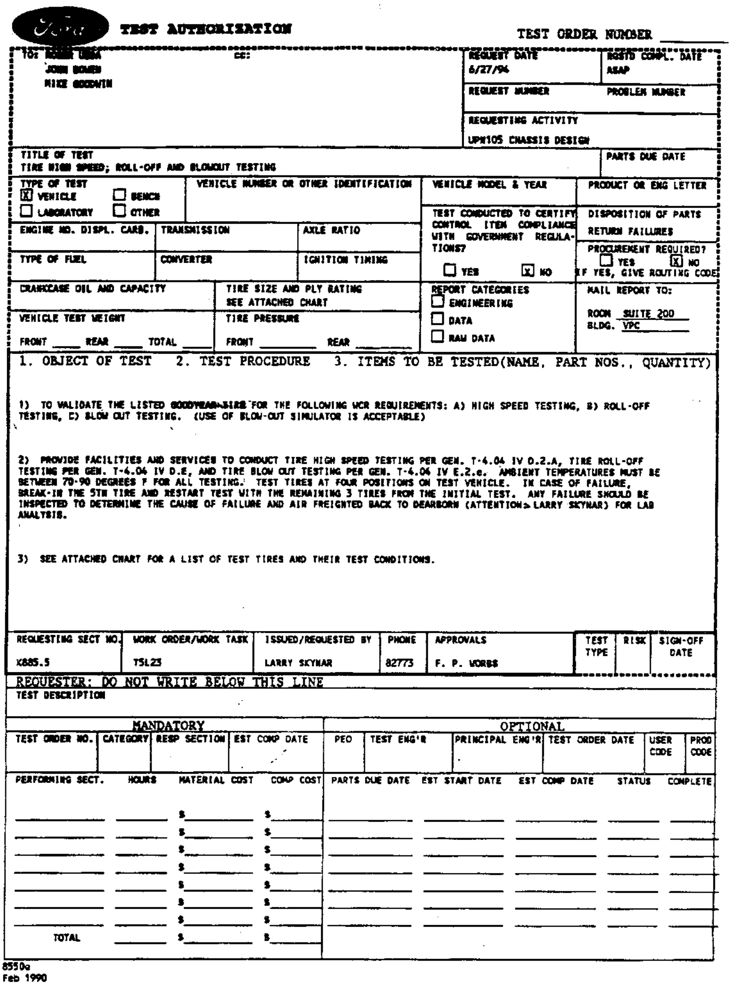
Decelration Rate 13 to 15 Fps. Yes X No ____

Position of tire on rim after loss of air inside flanges for entire 360 dergres. Yes X No ____

Driver's Name: M. Date: 6-29-94

I participated in the above described tire test (Rapid Air Loss Test) and certify that all the above information is ture

jrc/92



TEST AUTHORIZATION

TEST ORDER NUMBER ______

TO: [illegible]
JOHN BOWEN
MIKE GOODWIN

CC:

REQUEST DATE 6/27/94
RQSTD COMPL. DATE ASAP
REQUEST NUMBER
PROBLEM NUMBER
REQUESTING ACTIVITY UPN105 CHASSIS DESIGN

TITLE OF TEST
TIRE HIGH SPEED; ROLL-OFF AND BLOWOUT TESTING

PARTS DUE DATE

TYPE OF TEST
☒ VEHICLE ☐ BENCH
☐ LABORATORY ☐ OTHER

VEHICLE NUMBER OR OTHER IDENTIFICATION
VEHICLE MODEL & YEAR
PRODUCT OR ENG LETTER
ENGINE NO. DISPL. CARB.
TRANSMISSION
AXLE RATIO
TYPE OF FUEL
CONVERTER
IGNITION TIMING

TEST CONDUCTED TO CERTIFY CONTROL ITEM COMPLIANCE WITH GOVERNMENT REGULATIONS?
☐ YES ☒ NO

DISPOSITION OF PARTS
RETURN FAILURES

PROCUREMENT REQUIRED?
☐ YES ☒ NO
IF YES, GIVE ROUTING CODE

CRANKCASE OIL AND CAPACITY
TIRE SIZE AND PLY RATING
SEE ATTACHED CHART
VEHICLE TEST WEIGHT
FRONT ____ REAR ____ TOTAL ____
TIRE PRESSURE
FRONT ______ REAR ______

REPORT CATEGORIES
☐ ENGINEERING
☐ DATA
☐ RAW DATA

MAIL REPORT TO:
ROOM SUITE 200
BLDG. VPC

1. OBJECT OF TEST 2. TEST PROCEDURE 3. ITEMS TO BE TESTED(NAME, PART NOS., QUANTITY)

1) TO VALIDATE THE LISTED GOODYEAR TIRES FOR THE FOLLOWING WCR REQUIREMENTS: A) HIGH SPEED TESTING, B) ROLL-OFF TESTING, C) BLOW OUT TESTING. (USE OF BLOW-OUT SIMULATOR IS ACCEPTABLE)

2) PROVIDE FACILITIES AND SERVICES TO CONDUCT TIRE HIGH SPEED TESTING PER GEN. T-4.04 IV D.2.A, TIRE ROLL-OFF TESTING PER GEN. T-4.04 IV D.E, AND TIRE BLOW OUT TESTING PER GEN. T-4.04 IV E.2.e. AMBIENT TEMPERATURES MUST BE BETWEEN 70-90 DEGREES F FOR ALL TESTING. TEST TIRES AT FOUR POSITIONS ON TEST VEHICLE. IN CASE OF FAILURE, BREAK-IN THE 5TH TIRE AND RESTART TEST WITH THE REMAINING 3 TIRES FROM THE INITIAL TEST. ANY FAILURE SHOULD BE INSPECTED TO DETERMINE THE CAUSE OF FAILURE AND AIR FREIGHTED BACK TO DEARBORN (ATTENTION: LARRY SKYNAR) FOR LAB ANALYSIS.

3) SEE ATTACHED CHART FOR A LIST OF TEST TIRES AND THEIR TEST CONDITIONS.

REQUESTING SECT NO.	WORK ORDER/WORK TASK	ISSUED/REQUESTED BY	PHONE	APPROVALS	TEST TYPE	RISK	SIGN-OFF DATE
X885.5	T5L23	LARRY SKYNAR	82773	F. P. VORBS			

REQUESTER: DO NOT WRITE BELOW THIS LINE

TEST DESCRIPTION

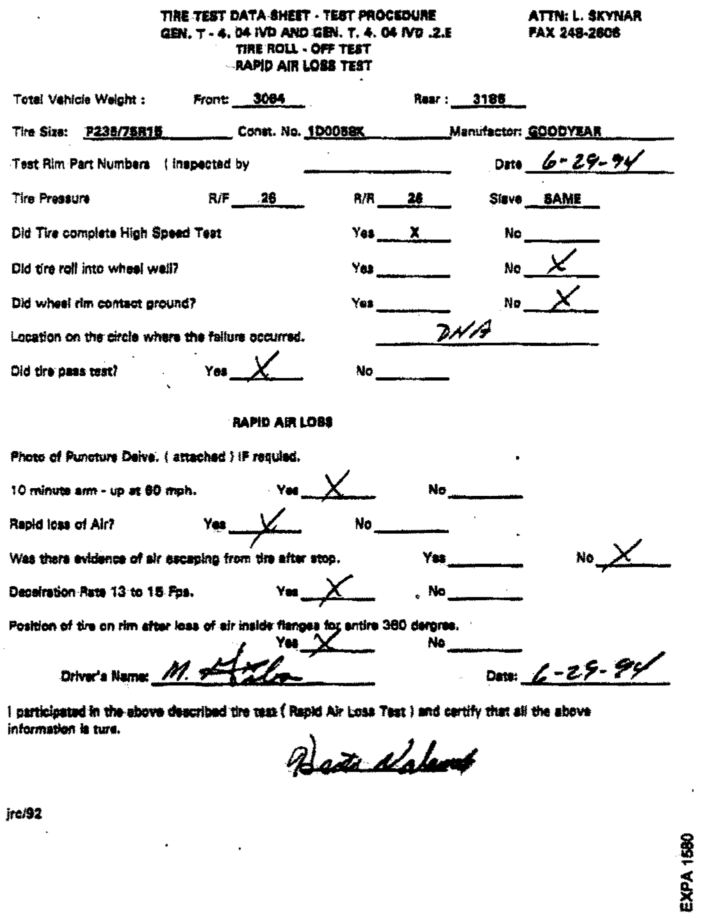
MANDATORY				OPTIONAL					
TEST ORDER NO.	CATEGORY	RESP SECTION	EST COMP DATE	PEO	TEST ENG'R	PRINCIPAL ENG'R	TEST ORDER DATE	USER CODE	PROD CODE

PERFORMING SECT.	HOURS	MATERIAL COST	COMP COST	PARTS DUE DATE	EST START DATE	EST COMP DATE	STATUS	COMPLETE
		$	$					
		$	$					
		$	$					
		$	$					
		$	$					
		$	$					
		$	$					
TOTAL		$	$					

8550a
Feb 1990

HIGH SPEED/BLOW OUT/ROLLOFF TESTING MATRIX HISPEEDF.XLS Jun.23,1994

TIRE SIZE	LOAD RANGE	TREAD	SUPPLIER	CONST. NUMBER	HIGH SPEED	MPH	ROLL OFF	BLOW OUT	LOADING (LB.) FRONT/REAR/GVW	INFLATION(PSI) FRONT/REAR	WHEELS	TEST VEHICLE	COMMENTS
P225/70R14	SL	A/S	MICHELIN	2095W	YES	105	YES	YES	/3046/	35/35	14X6.0	RANGER	F57A-1508-CA
P215/75R15	SL	A/T	FIRESTONE	ST318J	YES	90	YES	YES	3084/3186/6250	35/35	15X7.5	F150	F57A-1508-EA
P235/75R15	SL	A/T	GOODYEAR	1D0058K	YES	90	YES	YES	3084/3186/6250	26/26	15X7.5	F150	F57A-1508-FA
P235/75R15	SL	A/T	FIRESTONE	SL321J	YES	90	YES	YES	3064/3186-6250	26/26	15X7.7	F150	F57A=1508-FA
P235/75R15	SL	A/T	FIRESTONE	SR897J	YES	90	YES	YES	3064/3186-6250	26/26	15X7.7	F150	F57A-1508-FA
P265/70R16	SL	A/T	FIRESTONE	ST358J	YES	90	YES	YES	2120/4130/6250	30/30	16X7.0	F150	F57A-1508-JA



TIRE TEST DATA SHEET - TEST PROCEDURE
GEN. T - 4. 04 IVD AND GEN. T. 4. 04 IVD .2.E
TIRE ROLL - OFF TEST
RAPID AIR LOSS TEST

ATTN: L. SKYNAR
FAX 248-2606

Total Vehicle Weight : Front: 3084 Rear : 3186

Tire Size: P235/75R15 Const. No. 1D0058K Manufactor: GOODYEAR

Test Rim Part Numbers (Inspected by ______ Date 6-29-94

Tire Pressure R/F 26 R/R 26 Slave SAME

Did Tire complete High Speed Test Yes X No ______

Did tire roll into wheel well? Yes ______ No X

Did wheel rim contact ground? Yes ______ No X

Location on the circle where the failure occurred. DNA

Did tire pass test? Yes X No ______

RAPID AIR LOSS

Photo of Puncture Deive. (attached) IF requied.

10 minute arm - up at 60 mph. Yes X No ______

Rapid loss of Air? Yes X No ______

Was there evidence of air escaping from tire after stop. Yes ______ No X

Decelration Rate 13 to 15 Fps. Yes X No ______

Position of tire on rim after loss of air inside flanges for entire 360 dergres.
Yes X No ______

Driver's Name: M. Date: 6-29-94

I participated in the above described tire tesz (Rapid Air Loss Test) and certify that all the above information is ture.

jrc/92

TREAD WEAR TESTS

10K IRREGULAR	UN105	RANGER 4x4
3.78K SHOULDER	UN105	RANGER 4x4
1K GRAVEL	SURROGATE VEHICLE	

CONTROL TIRE: FIRESTONE ATX SL531J (1D8041)

TEST TIRE: GOODYEAR WRL RT/S 1D0058K

```
                              GOODYEAR TIRE
                          CONSTRUCTION COMPARISON

                    VENDOR: VEHICULAR TESTING SERVICES, INC.

                          TEST NO.: 1D00SPU69D

 DATE: 06-06-1994      MILEAGE:  3784         ENGINEER: ELF            ROTATION: CAR TO CAR
 LOAD: C+D  / C+D                             INFLATION F/R: 26 / 26

                   FASTEST WEARING GROOVE PROJECTIONS @  3784   MILES

 CONST #    1D0058K       1D0841
 SIZE       P235/75R15    P235/75R15
 TYPE       GOODYEAR      FIRESTONE ATX

   WP        MILES   GRV    MILES   GRV
  ----      -------  ---   -------  ---

   RF        24511    5     13730    1

   LF        22231    5      9670    1

   LR        40229    5     31063    5

   RR        42958    5     35398    4

 AVE FRT     23371          11700

 RAT/FRT    100.00          50.06

 AVE REAR    41593          33231

 RAT/REAR   100.00          79.90
                   ALL GROOVE AVERAGE PROJECTIONS @  3784   MILES

 CONST #    1D0058K       1D0841
 SIZE       P235/75R15    P235/75R15
 TYPE       GOODYEAR      FIRESTONE ATX

   WP          MILES         MILES
  ----        -------       -------

   RF          32511         18654

   LF          29498         14847

   LR          56059         40902

   RR          53754         47403

 AVE FRT       31004         16750

 RAT/FRT      100.00         54.03

 AVE REAR      54906         44153
```

GOODYEAR TIRE
CONSTRUCTION COMPARISON

VENDOR: VEHICULAR TESTING SERVICES, INC.

TEST NO.: 1D005PU66I

DATE: 06-24-1994 MILEAGE: 10000 ENGINEER: ELF ROTATION: CAR TO CAR
LOAD: C+D / C+D INFLATION F/R: 30 / 35

FASTEST WEARING GROOVE PROJECTIONS @ 10000 MILES

CONST #	1D0058K		1D8041	
SIZE	P235/75R15		P235/75R15	
TYPE	GOODYEAR		FIRESTONE	
WP	MILES	GRV	MILES	GRV
RF	73839	1	64335	3
LF	64738	1	52598	1
LR	30721	4	19473	3
RR	29439	3	18409	3
AVE FRT	69289		58466	
RAT/FRT	100.00		84.38	
AVE REAR	30080		18941	
RAT/REAR	100.00		62.97	

ALL GROOVE AVERAGE PROJECTIONS @ 10000 MILES

CONST #	100058K	1D8041
SIZE	P235/75R15	P235/75R15
TYPE	GOODYEAR	FIRESTONE
WP	MILES	MILES
RF	102093	78810
LF	87751	67072
LR	49235	41607
RR	45839	35345
AVE FRT	94922	72941
RAT/FRT	100.00	76.84
AVE REAR	47537	38476
RAT/REAR	100.00	80.94

SENT BY: ; 5-12-94 ; 9:40 ; 6U27537213→ 0260020U60;# 1

ts Change Notice - Arizona Proving Gr d

Vehicle Col /Vinity BLUE/WHITE		Product Line F-160	Program HS TIRE	Issued To GARAGE		"Q" Time / Explanation	Date & Time Assigned 5-12-94 0730	1-2C-94
Vehicle No. 309T029	Test No. A-7771	Vehicle Location DURA LOT		Start Odo 14791	Finish Odo 15068		Date & Time Completed 5-10-94 4:30 PM.	Time Issued

Part Number Removed	Qty	Part Name	Removal reason and part condition	Part Number Installed	Qty
			USE PREMIUM UNLEADED FUEL		
			MOBILE ONE SYNTHETIC ENGINE OIL		

Photo Req'd Yes ☐ No ☐

Photo's By

Time / Date

Return to Durability after repairs Yes ☐ No ☐

Person Released By / Transferred To:

Time / Date

Instruction to mechanics SCRAP ☐ RETURN ☐ HOLD ☐

	Mechanics Report
PLEASE CONDUCT HIGH SPEED TIRE TEST AS FOLLOWS.	Completed 60mi. at 60mph TfS 4-26-94
1) RUN 60 MILES BREAK-IN AT 60 MPH. ALLOW 2 HRS. TO COOL DOWN.	Completed 100 miles at 97 mph HMO 5-10-94
2) SET COLD TIRE PRESSURE TO FRONT. 26 REAR 36	Completed 100 mi. KLR 5-10-94
3) PERFORM TEST BETWEEN 70 AND 90 DEGREES AMBIENT.	
4) RUN 10 MILES WARM UP AT 70 MPH.	completed Tire Rolloff & Rapid Air Loss
5) RUN 200 MILES HIGH SPEED AT 96 MPH	Test Dismounted Test Tire per Inst.
6) RECORD TEMP, P.S.I. AND TIME DATA ON THE ATTACHED SHEETS.	
7) PERFORM TIRE ROLL OFF AND RAPID AIR LOSS TESTS PER THE	
ATTACHED SHEETS. RECORD RESULTS ON DATA SHEET.	
8) DISMOUNT TEST TIRES AND STACK BY THE TIRE MACHINE. PLACE	
THE WHEELS IN THE RACK. INSTALL THE ORIGINAL TIRES AND WHEELS	
THAT ARE STACKED BY THE MACHINE OR IN THE RACK.	

Issued By	Phone	Mechanic Signature	Approved By	Date Completed
MIKE GOODWIN	328			5-12-94

ATTN: L. SKYMAN

BAAZ 1009

TIRE TEST DATA SHEET - TEST PROCEDURE
GEN. T - 4. 04 IVD AND GEN. T. 4. 04 IVD .2.E
TIRE ROLL - OFF TEST
RAPID AIR LOSS TEST

ATTN:L. SKYNAR
FAX 248-2806

Total Vehicle Weight : Front: 3064 Rear : 3186

Tire Size: F235/75R15 Const. No. SR897J Manufactor: FIRESTONE

Test Rim Part Numbers (inspected by ________ Date ________

Tire Pressure RF 28 RR 26 Slave SAME

Did Tire complete High Speed Test Yes X No ____

Did tire roll into wheel well? Yes ____ No X

Did wheel rim contact ground? Yes ____ No X

Location on the circle where the failure occurred. DNA

Did tire pass test? Yes X No ____

RAPID AIR LOSS

Photo of Puncture Deive. (attached) IF requied.

10 minute arm - up at 60 mph. Yes X No ____

Rapid loss of Air? Yes X No ____

Was there evidence of air escaping from tire after stop. Yes ____ No X

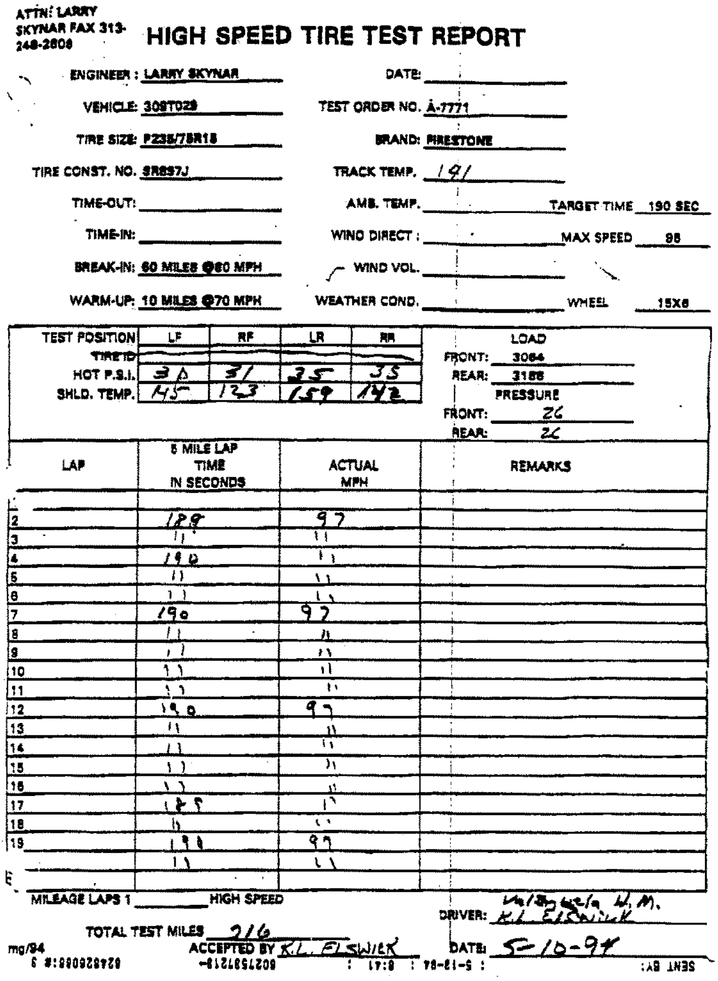
Decelration Rate 13 to 15 F Yes X No ____

Position of tire on rim after loss of air inside flanges for entire 360 dergree. Yes X No ____

Driver's Name: ________ Date: 5-12-44

I participated in the above described tire test (Rapid Air Loss Test) and certify that all the above information is ture.

jro/92



ATTN: LARRY
SKYNAR FAX 313-
248-2606

HIGH SPEED TIRE TEST REPORT

ENGINEER : LARRY SKYNAR
DATE:
VEHICLE: 309T029
TEST ORDER NO. A-7771
TIRE SIZE: P235/75R15
BRAND: FIRESTONE
TIRE CONST. NO. SR857J
TRACK TEMP. 191
TIME-OUT:
AMB. TEMP.
TARGET TIME 190 SEC
TIME-IN:
WIND DIRECT :
MAX SPEED 98
BREAK-IN: 60 MILES @60 MPH
WIND VOL.
WARM-UP: 10 MILES @70 MPH
WEATHER COND.
WHEEL 15X6

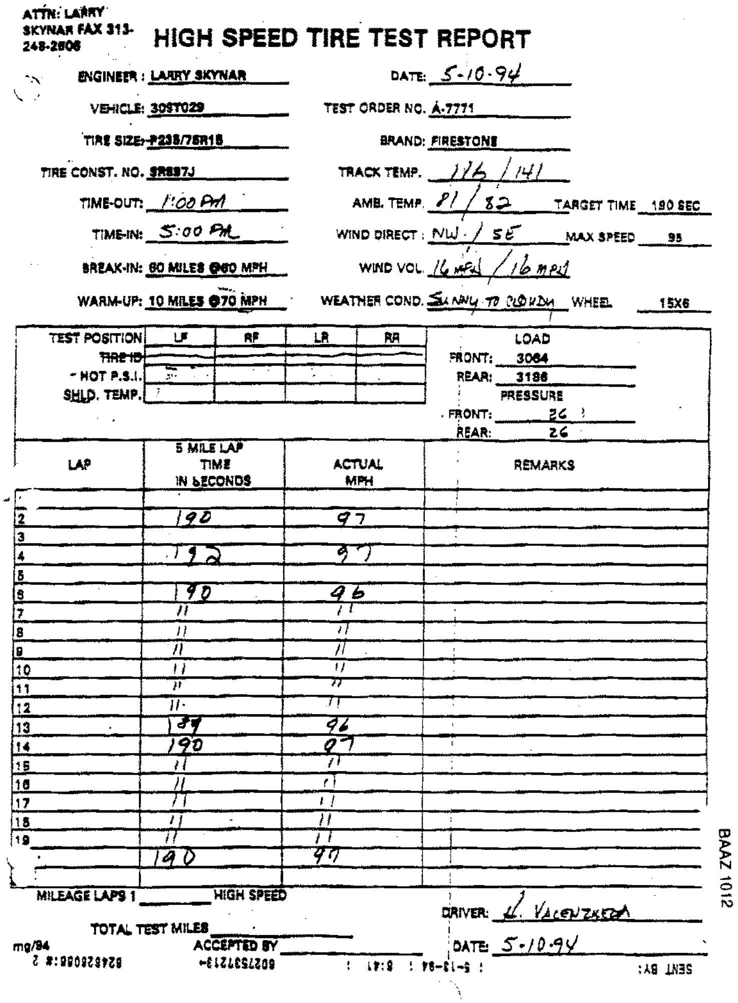
TEST POSITION	LF	RF	LR	RR
~~TIRE ID~~				
HOT P.S.I.	30	31	35	35
SHLD. TEMP.	145	123	159	142

LOAD
FRONT: 3064
REAR: 3186
PRESSURE
FRONT: 26
REAR: 26

LAP	5 MILE LAP TIME IN SECONDS	ACTUAL MPH	REMARKS
2	189	97	
3	″	″	
4	190	″	
5	″	″	
6	″	″	
7	190	97	
8	″	″	
9	″	″	
10	″	″	
11	″	″	
12	190	97	
13	″	″	
14	″	″	
15	″	″	
16	″	″	
17	189	″	
18	″	″	
19	191	97	
	″	″	

MILEAGE LAPS 1 ________ HIGH SPEED
DRIVER: Valenzuela W.M. K.L. Elswick
TOTAL TEST MILES 216
mg/94
ACCEPTED BY K.L. ELSWICK
DATE: 5-10-94

SENT BY: : 5-12-94 : 8:41 : 6027537218→ 2482606088:# 3



ATTN: LARRY
SKYNAR FAX 313-
248-2806

HIGH SPEED TIRE TEST REPORT

ENGINEER : LARRY SKYNAR

DATE: 5-10-94

VEHICLE: 30ST029

TEST ORDER NO. A-7771

TIRE SIZE: P235/75R15

BRAND: FIRESTONE

TIRE CONST. NO. SR887J

TRACK TEMP. 116 / 141

TIME-OUT: 1:00 PM

AMB. TEMP. 81 / 82

TARGET TIME 190 SEC

TIME-IN: 5:00 PM

WIND DIRECT : NW / SE

MAX SPEED 95

BREAK-IN: 60 MILES @60 MPH

WIND VOL. 16 mph / 16 mph

WARM-UP: 10 MILES @70 MPH

WEATHER COND. Sunny to cloudy

WHEEL 15X6

TEST POSITION	LF	RF	LR	RR
~~TIRE ID~~				
HOT P.S.I.				
SHLD. TEMP.				

LOAD
FRONT: 3064
REAR: 3186

PRESSURE
FRONT: 26
REAR: 26

LAP	5 MILE LAP TIME IN SECONDS	ACTUAL MPH	REMARKS
2	190	97	
3			
4	192	97	
5			
6	190	96	
7	"	"	
8	"	"	
9	"	"	
10	"	"	
11	"	"	
12	"	"	
13	189	96	
14	190	97	
15	"	"	
16	"	"	
17	"	"	
18	"	"	
19	"	"	
	190	97	

MILEAGE LAPS 1 ______ HIGH SPEED

TOTAL TEST MILES ______

ACCEPTED BY ______

DRIVER: U. Valenzuela

DATE: 5-10-94

mg/94

SENT BY: ; 5-13-94 ; 8:41 ; 8027537213→ 8248280068:# 2

```
ADAMS Model Title:
    1992 Explorer 2 door 4x4  (Prototype)

-----------------------------------------------------------------------------

  NOTE:  * THIS MODEL CONTAINS NON-PRODUCTION COMPONENTS AND MODIFICATIONS *


  Last Updated   :   1/9/91
  Ford FSUB      :   ADAMS90c
  ADAMS Version  :   5.2.1

  Vehicle Description:

      - Tire mu set to 1.00
      - Tire relaxation set to 0.60
      - Tire damping set to 0.1
      - Springs have been changed to model actual vehicle rate test data
      - Front stabilizer bar          23 mm
      - Rear stabilizer bar           19 mm

  Based on Models by:

      1. 1985 Bronco II 4x2                           P. Hackert     1/01/84
      2. 1990 Explorer 4x2 Prototype                  F. Figliomeni 10/03/88
      3. 1990 Explorer 4x2                            Don Tandy      2/14/90
      4. 1990 Explorer 4 door 4x2                     Don Tandy     11/08/90
      5. 1992 Explorer 2 door 4x2                     W. Smith       3/12/91

  Recent Model Modifications:

      - UN46 modified for SLA by A. Sitchin           A. Sitchin     4/25/90
      - UN46 SLA modified steering geometry           Don Tandy      5/01/90
      - Suspension points updated                     Don Tandy      8/10/90
      - Wts, CG's & Rr. suspension revised            A. Sitchin     8/31/90
      - Updated SFORCE on jounce and rebound bumpers Greg Stevens    1/09/91
        and on 2nd stage leaf
      - Changed HAVSIN to STEP for steering                *

  Tires:  Firestone ATX P235/75R15  29 psi  7 in Wheel

  Manuever:
      - Speed     = 55 mph
      - Loading   = GVW  4 PASS + CARGO        baseline - 15% FRT SPR
      - Angle     = 180 degrees

-----------------------------------------------------------------------------
```

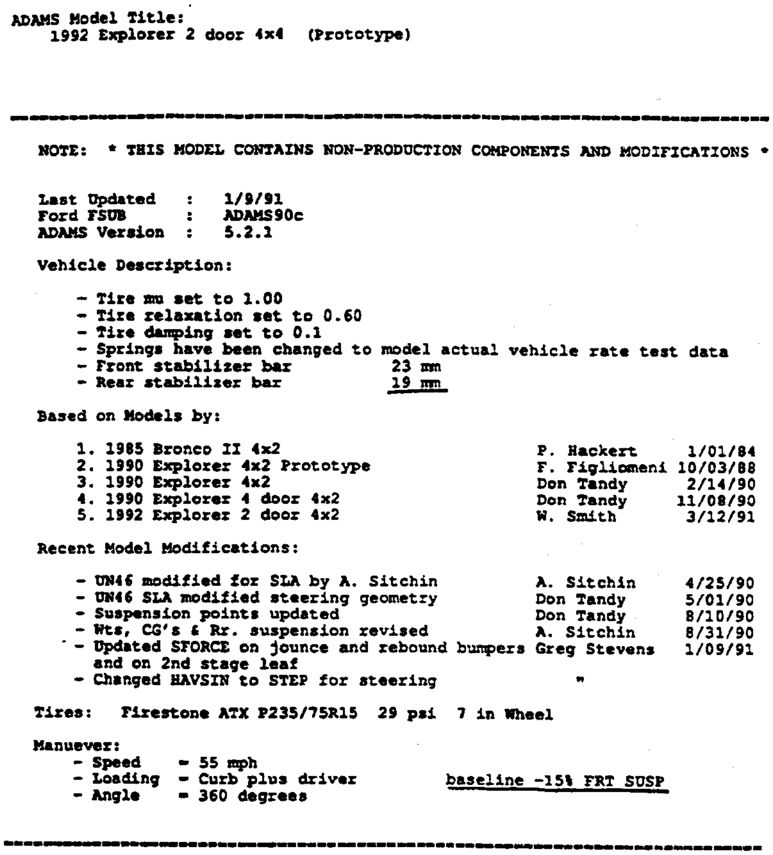
```
                    ==========================================
                    =     ADAMS  J-TURN  TEST  RESULTS       =
                    ==========================================

ADAMS Model Title:
    1992 Explorer 2 door 4x4  (Prototype)


                     ***  INITIAL CONDITIONS  ***

             Left  Front Tire Load          =    1126.99 lbs
             Right Front Tire Load          =    1079.91 lbs
             Left  Rear  Tire Load          =    1295.58 lbs
             Right Rear  Tire Load          =    1277.67 lbs
             Front Axle Load                =    2206.90 lbs
             Rear  Axle Load                =    2573.25 lbs
             Total Vehicle Weight           =    4780.15 lbs
             Vehicle Velocity               =      55.00 mph

                     ***  TRANSIENT NUMBERS  ***

             Peak Yaw Rate                  =      34.25 deg/sec
             Peak Lateral Acceleration      =       0.78 G's
             Peak Roll Angle                =       6.18 degrees
             Peak Sideslip Angle            =      26.56 degrees
             Yaw Rate Overshoot             =      85.14 %
             Lateral Acceleration Overshoot =       7.10 %
             Roll Angle Overshoot           =       5.80 %
             Sideslip Angle Overshoot       =      17.75 %
             Maximum Front Outside Tire Load =   2279.71 lbs
             Maximum Rear  Outside Tire Load =   2361.02 lbs
             Minimum Front Inside Tire Load  =     52.23 lbs
             Minimum Rear  Inside Tire Load  =    239.24 lbs

                 ***  APPROXIMATED STEADY STATE VALUES  ***

             Yaw Rate                       =      18.50 deg/sec
             Lateral Acceleration           =       0.73 G's
             Roll Angle                     =       5.84 degrees
             Sideslip Angle                 =      22.55 degrees
             Final Vehicle Velocity         =      24.80 mph
             Left  Front Tire Load          =      88.47 lbs
             Right Front Tire Load          =    2172.36 lbs
             Left  Rear  Tire Load          =     278.47 lbs
             Right Rear  Tire Load          =    2237.96 lbs
             Steering Wheel Angle           =     180.00 deg Left

                  ***  VEHICLE HANDLING PARAMETERS  ***

             Weight Distribution            =     46.168 % front
             Lateral Load Transfer Dist.    =     51.869 % front
             Lat. Accel. Response Time      =      0.358 sec to 90%
             Yaw Rate Response Time         =      0.475 sec to peak
```

```
ADAMS Model Title:
    1992 Explorer 2 door 4x4  (Prototype)


---------------------------------------------------------------------------

  NOTE:  * THIS MODEL CONTAINS NON-PRODUCTION COMPONENTS AND MODIFICATIONS *

  Last Updated   :   1/9/91
  Ford FSUB      :   ADAMS90c
  ADAMS Version  :   5.2.1

  Vehicle Description:

      - Tire mu set to 1.00
      - Tire relaxation set to 0.60
      - Tire damping set to 0.1
      - Springs have been changed to model actual vehicle rate test data
      - Front stabilizer bar           23 mm
      - Rear stabilizer bar            16 mm

  Based on Models by:

      1. 1985 Bronco II 4x2                            P. Hackert     1/01/84
      2. 1990 Explorer 4x2 Prototype                   F. Figliomeni 10/03/88
      3. 1990 Explorer 4x2                             Don Tandy      2/14/90
      4. 1990 Explorer 4 door 4x2                      Don Tandy     11/08/90
      5. 1992 Explorer 2 door 4x2                      W. Smith       3/12/91

  Recent Model Modifications:

      - UN46 modified for SLA by A. Sitchin            A. Sitchin     4/25/90
      - UN46 SLA modified steering geometry            Don Tandy      5/01/90
      - Suspension points updated                      Don Tandy      8/10/90
      - Wts, CG's & Rr. suspension revised             A. Sitchin     8/31/90
      - Updated SFORCE on jounce and rebound bumpers Greg Stevens     1/09/91
        and on 2nd stage leaf
      - Changed HAVSIN to STEP for steering                 "

  Tires:   Firestone ATX P235/75R15  29 psi  7 in Wheel

  Manuever:
      - Speed     = 55 mph
      - Loading   = GVW  4 PASS + CARGO        baseline - 15% FRT SPR
      - Angle     = 270 degrees

---------------------------------------------------------------------------
```

```
----------------------------------------
-    ADAMS  J-TURN  TEST  RESULTS     -
----------------------------------------

ADAMS Model Title:
    1992 Explorer 2 door 4x4  (Prototype)


                  ***  INITIAL CONDITIONS  ***

            Left  Front Tire Load            -  1127.44 lbs
            Right Front Tire Load            -  1079.46 lbs
            Left  Rear  Tire Load            -  1295.19 lbs
            Right Rear  Tire Load            -  1278.06 lbs
            Front Axle Load                  -  2206.90 lbs
            Rear  Axle Load                  -  2573.25 lbs
            Total Vehicle Weight             -  4780.15 lbs
            Vehicle Velocity                 -    55.00 mph

                  ***  TRANSIENT NUMBERS  ***

            Peak Yaw Rate                    -    35.67 deg/sec
            Peak Lateral Acceleration        -     0.78 G's
            Peak Roll Angle                  -     7.27 degrees
            Peak Sideslip Angle              -    22.67 degrees
            Yaw Rate Overshoot               -   153.05 %
            Lateral Acceleration Overshoot   -    13.15 %
            Roll Angle Overshoot             -    28.98 %
            Sideslip Angle Overshoot         -   111.71 %
            Maximum Front Outside Tire Load  -  2529.27 lbs
            Maximum Rear  Outside Tire Load  -  2432.50 lbs
            Minimum Front Inside Tire Load   -     1.48 lbs
            Minimum Rear  Inside Tire Load   -   177.02 lbs

            ***  APPROXIMATED STEADY STATE VALUES  ***

            Yaw Rate                         -    14.10 deg/sec
            Lateral Acceleration             -     0.69 G's
            Roll Angle                       -     5.64 degrees
            Sideslip Angle                   -    10.71 degrees
            Final Vehicle Velocity           -    29.27 mph
            Left  Front Tire Load            -   144.15 lbs
            Right Front Tire Load            -  2157.34 lbs
            Left  Rear  Tire Load            -   363.67 lbs
            Right Rear  Tire Load            -  2115.15 lbs
            Steering Wheel Angle             -   270.00 deg Left

               ***  VEHICLE HANDLING PARAMETERS  ***

            Weight Distribution              -   46.168 % front
            Lateral Load Transfer Dist.      -   53.820 % front
            Lat. Accel. Response Time        -    0.185 sec to 90%
            Yaw Rate Response Time           -    0.388 sec to peak
```

```
ADAMS Model Title:
   1992 Explorer 2 door 4x4  (Prototype)

--------------------------------------------------------------------------------

  NOTE:  * THIS MODEL CONTAINS NON-PRODUCTION COMPONENTS AND MODIFICATIONS *

  Last Updated   :   1/9/91
  Ford FSUB      :   ADAMS90c
  ADAMS Version  :   5.2.1

  Vehicle Description:

      - Tire mu set to 1.00
      - Tire relaxation set to 0.60
      - Tire damping set to 0.1
      - Springs have been changed to model actual vehicle rate test data
      - Front stabilizer bar          23 mm
      - Rear stabilizer bar           16 mm

  Based on Models by:

      1. 1985 Bronco II 4x2                           P. Hackert     1/01/84
      2. 1990 Explorer 4x2 Prototype                  F. Figliomeni 10/03/88
      3. 1990 Explorer 4x2                            Don Tandy      2/14/90
      4. 1990 Explorer 4 door 4x2                     Don Tandy     11/08/90
      5. 1992 Explorer 2 door 4x2                     W. Smith       3/12/91

  Recent Model Modifications:

      - UN46 modified for SLA by A. Sitchin           A. Sitchin     4/25/90
      - UN46 SLA modified steering geometry           Don Tandy      5/01/90
      - Suspension points updated                     Don Tandy      8/10/90
      - Wts, CG's & Rr. suspension revised            A. Sitchin     8/31/90
      - Updated SFORCE on jounce and rebound bumpers  Greg Stevens   1/09/91
        and on 2nd stage leaf
      - Changed HAVSIN to STEP for steering                "

  Tires:   Firestone ATX P235/75R15  29 psi  7 in Wheel

  Manuever:
      - Speed     = 55 mph
      - Loading   = rgawr
      - Angle     = ~~100~~ degrees
                    [illegible]

--------------------------------------------------------------------------------
```

```
                    =======================================
                    =   ADAMS  J-TURN  TEST  RESULTS      =
                    =======================================

ADAMS Model Title:
    1992 Explorer 2 door 4x4  (Prototype)


                         ***  INITIAL CONDITIONS  ***

             Left  Front Tire Load           =    1124.97 lbs
             Right Front Tire Load           =    1077.02 lbs
             Left  Rear  Tire Load           =    1297.56 lbs
             Right Rear  Tire Load           =    1280.61 lbs
             Front Axle Load                 =    2201.99 lbs
             Rear  Axle Load                 =    2578.17 lbs
             Total Vehicle Weight            =    4780.16 lbs
             Vehicle Velocity                =      55.00 mph

                         ***  TRANSIENT NUMBERS  ***

             Peak Yaw Rate                   =      35.40 deg/sec
             Peak Lateral Acceleration       =       0.79 G's
             Peak Roll Angle                 =       6.95 degrees
             Peak Sideslip Angle             =      27.13 degrees
             Yaw Rate Overshoot              =     101.54 %
             Lateral Acceleration Overshoot  =       7.76 %
             Roll Angle Overshoot            =      20.22 %
             Sideslip Angle Overshoot        =      26.49 %
             Maximum Front Outside Tire Load =    2497.91 lbs
             Maximum Rear  Outside Tire Load =    2457.12 lbs
             Minimum Front Inside Tire Load  =       0.00 lbs
             Minimum Rear  Inside Tire Load  =     192.33 lbs

                   ***  APPROXIMATED STEADY STATE VALUES  ***

             Yaw Rate                        =      17.56 deg/sec
             Lateral Acceleration            =       0.73 G's
             Roll Angle                      =       5.78 degrees
             Sideslip Angle                  =      21.45 degrees
             Final Vehicle Velocity          =      22.76 mph
             Left  Front Tire Load           =      94.42 lbs
             Right Front Tire Load           =    2211.79 lbs
             Left  Rear  Tire Load           =     299.64 lbs
             Right Rear  Tire Load           =    2186.85 lbs
             Steering Wheel Angle            =     270.00 deg Left

                     ***  VEHICLE HANDLING PARAMETERS  ***

             Weight Distribution             =     46.065 % front
             Lateral Load Transfer Dist.     =     53.209 % front
             Lat. Accel. Response Time       =      0.248 sec to 90%
             Yaw Rate Response Time          =      0.388 sec to peak
```



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ADAMS Model Title:
    1992 Explorer 2 door 4x4  (Prototype)

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  NOTE:  * THIS MODEL CONTAINS NON-PRODUCTION COMPONENTS AND MODIFICATIONS *

  Last Updated   :  1/9/91
  Ford FSUB      :  ADAMS90c
  ADAMS Version  :  5.2.1

  Vehicle Description:

      - Tire mu set to 1.00
      - Tire relaxation set to 0.60
      - Tire damping set to 0.1
      - Springs have been changed to model actual vehicle rate test data
      - Front stabilizer bar         23 mm
      - Rear stabilizer bar          19 mm

  Based on Models by:

     1. 1985 Bronco II 4x2                        P. Hackert     1/01/84
     2. 1990 Explorer 4x2 Prototype               F. Figliomeni 10/03/88
     3. 1990 Explorer 4x2                         Don Tandy      2/14/90
     4. 1990 Explorer 4 door 4x2                  Don Tandy     11/08/90
     5. 1992 Explorer 2 door 4x2                  W. Smith       3/12/91

  Recent Model Modifications:

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     - Suspension points updated                  Don Tandy      8/10/90
     - Wts, CG's & Rr. suspension revised         A. Sitchin     8/31/90
     - Updated SFORCE on jounce and rebound bumpers Greg Stevens  1/09/91
       and on 2nd stage leaf
     - Changed HAVSIN to STEP for steering             "

  Tires:   Firestone ATX P235/75R15  29 psi  7 in Wheel

  Manuever:
     - Speed     = 55 mph
     - Loading   = Curb plus driver         baseline -15% FRT SUSP
     - Angle     = 360 degrees

--------------------------------------------------------------------------
```

```
        ====================================
        -   ADAMS  J-TURN  TEST  RESULTS   -
        ====================================

ADAMS Model Title:
    1992 Explorer 2 door 4x4  (Prototype)


                 ***  INITIAL CONDITIONS  ***

            Left  Front Tire Load          -   1131.97 lbs
            Right Front Tire Load          -   1036.13 lbs
            Left  Rear  Tire Load          -    999.20 lbs
            Right Rear  Tire Load          -    942.20 lbs
            Front Axle Load                -   2168.10 lbs
            Rear  Axle Load                -   1941.40 lbs
            Total Vehicle Weight           -   4109.50 lbs
            Vehicle Velocity               -     54.99 mph

                 ***  TRANSIENT NUMBERS  ***

            Peak Yaw Rate                  -     39.59 deg/sec
            Peak Lateral Acceleration      -      0.81 G's
            Peak Roll Angle                -      5.85 degrees
            Peak Sideslip Angle            -     17.25 degrees
            Yaw Rate Overshoot             -     83.07 %
            Lateral Acceleration Overshoot -     16.20 %
            Roll Angle Overshoot           -     34.71 %
            Sideslip Angle Overshoot       -    207.17 %
            Maximum Front Outside Tire Load -  2339.00 lbs
            Maximum Rear  Outside Tire Load -  1857.26 lbs
            Minimum Front Inside Tire Load -    186.54 lbs
            Minimum Rear  Inside Tire Load -     33.71 lbs

            ***  APPROXIMATED STEADY STATE VALUES  ***

            Yaw Rate                       -     21.63 deg/sec
            Lateral Acceleration           -      0.70 G's
            Roll Angle                     -      4.35 degrees
            Sideslip Angle                 -      5.62 degrees
            Final Vehicle Velocity         -     29.21 mph
            Left  Front Tire Load          -    332.00 lbs
            Right Front Tire Load          -   1966.58 lbs
            Left  Rear  Tire Load          -    210.57 lbs
            Right Rear  Tire Load          -   1595.34 lbs
            Steering Wheel Angle           -    360.00 deg Left

              ***  VEHICLE HANDLING PARAMETERS  ***

            Weight Distribution            -    52.758 % front
            Lateral Load Transfer Dist.    -    54.550 % front
            Lat. Accel. Response Time      -     0.091 sec to 90%
            Yaw Rate Response Time         -     4.101 sec to peak
```

Ford

To D. Onkka

"RECORD COPY"
Schedule no 7-4-2
Retain Until 1-1-95

T.O. Number N23361
Date of Order 10/16/89
Test Auth. No.
Work Task No. T2L10
Test Dates 10/23/89 — 11/09/89
Date Reported 11/29/89

Subject : Steady state and transient handling properties of a 1989 Bronco II Eddie Bauer, 1989 Chevy Blazer 4x4, and a 1990 UN46 3 Dr. at two tire pressures.

Requested By : Light Truck Dynamics-D. Onkka

Object : To determine and compare the vehicle understeer coefficient, roll gradient, lateral acceleration frequency response, yaw rate frequency response, lateral acceleration response times and yaw rate response times of the these subject vehicles.

Summary : The test results are summarized in Tables 1 through 3, which appear on pages 3 to 5 of this report.

1. Constant Radius Handling Test

   A. The UN46 at both tire pressures have a higher body roll gradient in left turns than in right turns.

   B. The Chevy Blazer has the highest body roll gradient of the vehicles tested. The UN46 has higher body roll gradient then the Bronco II.

   C. The Bronco II and the UN46 both exhibit high levels of front suspension jacking. The jacking increases slowly with lateral acceleration to about 0.4 G (0.25 inches jacking) and then the rate of increase accelerates. At 0.65 G the jacking is about 2.5 inches. In comparison the Chevy Blazer increases slowly with lateral acceleration to about 0.25 inches @ 0.65 G lateral acceleration.

   D. The UN46 at both tire pressures requires the highest steering wheel angle input to maintain a lateral acceleration level. The Bronco II and the Chevy Blazer require similar steering wheel inputs at any lateral acceleration levels until the higher G levels, where the Bronco II requires more steering wheel angle.

E. In right turns the UN46 @ 35/35 psi requires less steering wheel angle input than the UN46 @ 26/26 psi. This difference increases with lateral acceleration. In left turns the difference, although smaller are reversed.

F. The Blazer requires more steering wheel torque than any of the other vehicle although the overall level is not very high.

2. Random Steer Test

A. The Chevy Blazer has the most predictable and flattest yaw rate response.

B. Performance of all parameters degrade as the speed increases from 45 to 60 mph.

C. All vehicles display similar lateral acceleration response.

D. The UN46 has the least roll damping of the group.

E. Yaw rate to lateral acceleration response characteristics are best in Chevy Blazer.

F. Overall transient handling characteristics are very similar although the data indicates the Blazer is the best.

Keith VanGorder

Keith Van Gorder
Research Engineer
Development NVH & Handling Analysis
NVH and Advanced Technology Dept.

Concur: D.S. Starr
Research Engineer
Development NVH & Handling Analysis
NVH and Advanced Technology Dept

A thank you to Jerry Holmes, Kevin Markham, and Len Richter, the test drivers and technicians who instrumented and drove the vehicle for the following tests.

TABLE 1 : SUMMARY OF STEADY STATE HANDLING PROPERTIES

PARAMETERS	VEHICLE							
	UN46 3 Dr. @ 26/26 psi		UN46 3 Dr. @ 35/35 PSI		BRONCO II (EDDIE BAUER)		CHEVY BLAZER 4x4	
	Left	Right	Left	Right	Left	Right	Left	Right
Maximum Lateral Acceleration (G's)	.647	.658	.702	.678	.656	.697	.692	.684
Body Roll Gradient (Degrees / G)	6.23	5.61	6.37	5.22	5.46	5.30	6.44	6.42
Total Roll Gradient (Degrees / G) (average)	6.66		6.34		6.48		6.69	
Steer Torque Gradient @ 0.25 G's (inch-lbs / G)	30.97	27.30	28.32	29.19	38.25	47.76	38.48	30.31
Understeer Coefficient @ G level								
0.2 G's	3.30	4.60	3.38	4.18	3.99	3.59	3.77	3.47
0.25 G's	3.72	4.68	3.85	4.18	4.35	3.79	3.72	4.05
0.3 G's	4.58	5.12	5.24	4.71	4.92	4.14	3.94	4.74
0.4 G's	7.58	7.06	10.76	7.34	6.63	5.30	5.22	6.45
0.5 G's	8.20	10.41	19.93	12.05	12.5	7.05	7.59	8.59
0.6 G's	56.2	41.1	31.3	29.2	43.9	25.0	24.5	25.5
0.7 G's	NA	118.2	43.7	89.3	130.4	77.2	119.7	51.3
0.8 G's	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 2 : SUMMARY OF RANDOM STEER TEST RESULTS

PARAMETERS	CONDITION: 45 MPH			
	Vehicles			
	UN46 3 Dr. @ 26/26 psi	UN46 3 Dr. @ 35/35 psi	Bronco II Eddie Bauer	Chevy Blazer 4x4
Yaw Rate :				
Peak Magnitude (Deg./sec/100 deg. SWA)	21.26	21.11	21.24	22.41
Peak Magnitude/SS Mag.	1.4106	1.3410	1.3374	1.1623
Peak Frequency (Hz.)	1.0948	1.0948	1.1730	.9775
-3 dB Frequency (Hz.)	1.8115	1.8384	2.1545	2.1387
45 Deg. Phase Lag Time (seconds)	.1279	.1296	.1307	.1374
Lateral Acceleration:				
Low Frequency Gain (G's/100 deg. SWA)	.5269	.5507	.5655	.6671
-3 dB Frequency (Hz.)	1.1662	1.1179	1.0984	1.0474
45 Deg. Phase Lag Time (seconds)	.1717	.1714	.1652	.1730
Roll Angle:				
Resonant Frequency (Hz.)	2.346	2.4633	2.3069	2.3460
Yaw Rate to Lat. Accel. Lead Time @ 1 Hz. (secs.)	.0746	.0685	.0499	.0458

TABLE 3 : SUMMARY OF RANDOM STEER TEST RESULTS

PARAMETERS	CONDITION: 60 MPH			
	Vehicles			
	UN46 3 Dr. @ 26/26 psi	UN46 3 Dr. @ 35/35 psi	Bronco II Eddie Bauer	Chevy Blazer 4x4
Yaw Rate :				
Peak Magnitude (Deg./sec/100 deg. SWA)	23.86	24.35	24.31	25.06
Peak Magnitude/SS Mag.	1.6761	1.5877	1.6943	1.3463
Peak Frequency (Hz.)	.9775	.8602	.8211	.8993
-3 dB Frequency (Hz.)	1.7027	1.8983	1.9072	1.8713
45 Deg. Phase Lag Time (seconds)	.1295	.1328	.1393	.1432
Lateral Acceleration:				
Low Frequency Gain (G's/100 deg. SWA)	.6428	.6861	.6846	.8265
-3 dB Frequency (Hz.)	1.0686	1.0272	.9454	.9186
45 Deg. Phase Lag Time (seconds)	.1826	.1862	.1857	.2021
Roll Angle:				
Resonant Frequency (Hz.)	2.346	2.5024	2.3460	2.3069
Yaw Rate to Lat. Accel. Lead Time @ 1 Hz. (secs.)	.1042	.1012	.0838	.0760

UN46 VEHICLE HANDLING COMPARISON TEST

VEHICLE DESCRIPTION:

Make and Model:	1990 UN46 3 Dr.
Vehicle Number:	316T008
V.I.N.:	N/A
Wheelbase:	102 inches
Track;	Front:58.5 inches Rear:58.0 inches
Suspension Type;	Front:Independent w/stab. bar Rear:Solid Axle w/stab. bar
Engine:	4.0 L V-6 EFI
Transmission:	AOD
Steering System:	Power Assisted rack & pinion
Overall Steering Gear Ratio:	23.5 : 1 for tire pressure of 26/26 psi 21.7 : 1 for tire pressure of 35/35 psi
Tires:	Firestone ATX M+S
Tire Pressure; Front:	26 psi and 35 psi There were 2 tire
Rear:	26 psi and 35 psi pressures used in tests.

		Test Wt.
Test Weights;	Left Front:	1164
	Right Front:	1118
	Left Rear:	983
	Right Rear:	905
	Total:	4170 lbs.

WT. Distribution (as tested):	54.7 % Front 45.2 % Rear
Other:	The tires were new for the test with 50 miles break in. The tread depth was 13/32 inches for all tires.

UN46 VEHICLE HANDLING COMPARISON TEST

VEHICLE DESCRIPTION:

Make and Model:		1989 Chevy Blazer 4x4 High Country
Vehicle Number:		309T653
V.I.N.:		1GNCT18Z4K8168202
Wheelbase:		101 inches
Track;	Front:	56.25 inches
	Rear:	55.0 inches
Suspension Type;	Front:	Independent w/stab. bar
	Rear:	Solid Axle w/leaf
Engine:		4.3 L V-6
Transmission:		Automatic with overdrive/4x4
Steering System:		Power Assisted rack & pinion
Overall Steering Gear Ratio:		18.6 : 1 as determined on a 195 ft radius circle.
Tires:		Uniroyal Laredo M+S
Tire Pressure;	Front:	35 psi
	Rear:	35 psi
		Test Wt.
Test Weights;	Left Front:	1040
	Right Front:	1073
	Left Rear:	940
	Right Rear:	948
	Total:	4001 lbs.
WT. Distribution (as tested):		52.8 % Front 47.1 % Rear
Other:		The tires were new for the test with 50 miles break in. The tread depth was 14/32 inches for all tires.

UN46 VEHICLE HANDLING COMPARISON TEST

VEHICLE DESCRIPTION:

Make and Model:		1989 Bronco II Eddie Bauer Edition
Vehicle Number:		316T656
V.I.N.:		1FMCU14T5KUB11002
Wheelbase:		94 inches
Track;	Front:	57.0 inches
	Rear:	56.875 inches
Suspension Type;	Front:	Independent w/stab. bar
	Rear:	Solid Axle w/stab. bar
Engine:		2.9 L V-6 EFI
Transmission:		Manual 4 speed with overdrive
Steering System:		Power Assisted rack & pinion
Overall Steering Gear Ratio:		22.3 : 1 as determined on a 195 ft radius circle
Tires:		Firestone FR480
Tire Pressure;	Front:	35 psi
	Rear:	35 psi
		Test Wt.
Test Weights;	Left Front:	979
	Right Front:	1013
	Left Rear:	932
	Right Rear:	910
	Total:	3836 lbs.
WT. Distribution (as tested):		51.9 % Front 48.0 % Rear
Other:		The tires were new for the test with 50 miles break in. The tread depth was [illegible] inches for all tires.

UN46 VEHICLE HANDLING COMPARISON TEST

INSTRUMENTATION:

- Humphrey Gyroscopic Platform No. CF70-0101-1 (serial number H2) to measure corrected lateral acceleration and roll angle. The unit was mounted where the front passenger seat is normally located.
- Humphrey Yaw Rate Gyro No. RG51-0106-1 (full scale range = +-40 deg/sec)
- Sensor Development Steering Wheel Angle and Torque Transducer Model 01002-1
- Fifth wheel used to measure longitudinal velocity
- 4 Rayelco string potentiometers to measure vertical wheel deflection relative to the body
- Megadac data acquisition system to collect data from the string potentiometers
- Signal Conditioning Package
- Motorola 6809 based data acquisition system to collect and preprocess data
- Kyowa RTP-501 Phillips cassette type FM recorder on some tests to record data
- Termiflex HT-3 Terminal for communication with the microprocessor

DISCUSSION OF TEST RESULTS

A. Constant Radius Handling Method

The test results are summarized in Table 1. Comparison plots of the test data output are in Appendix A. The plots and data analysis reports with predicted gains for each individual vehicle at each test condition are in Appendices B, C, and D. One test weight was used for these tests. The test weights for each vehicle are listed on the vehicle information pages 6-8. The constant radius handling plots contain only the UN46 @ tire pressure of ~~26~~/26 psi unless otherwise noted on the graph.

It should be noted the total vehicle roll and body roll numbers may not show direct correlation with each other, specifically with regard to turn direction. Part of this is due to the way that the stable platform works and to the condition of the platform installed in the vehicle. Increased bearing friction in the gyro gimbals adds to the operation of the gyro. This problem is not as apparent in the trucks tested, as shown by the roll gradient numbers on Table 1.

The body roll vs. lateral acceleration comparison plots are in Appendix A. The plots of the individual vehicles in appendices B, C, and D show linear response for all the vehicles. The Bronco II and Chevy Blazer exhibit symmetric response between left and right turns. The UN46 at both tire pressures has a higher body roll gradient in left turns than in right turns. The Blazer has the highest body roll gradient of all the vehicles tested. The Chevy Blazer and the UN46 @ 26/26 psi have the highest total roll gradient of the all the vehicles tested. The UN46 has more body roll than the Bronco II.

Front jacking plots indicate a large difference between the UN46, Bronco II, and the Chevy Blazer. The front jacking on the Bronco II and UN46 slowly increases until about 0.4 G lateral acceleration and then the rate of increase accelerates. As an example for the Bronco II @ 0.4 G the amount of jacking is 0.25 inches, and then at 0.65 G the jacking is at 2.5 inches. In comparison the Chevy Blazer increases slowly with lateral acceleration to about 0.25 inches @ 0.65 G.

Rear jacking in both turn directions is low for all test vehicles. There appears to be little difference in rear jacking between left and right turns.

The steer torque gradient @ 0.25 G's in left turns is lowest for the UN46 at both tire pressures as compared to the other vehicles tested. In right turns the Bronco II has the highest steer torque gradient with the UN46 and Blazer about the same. The steering wheel torque magnitudes are highest for the Chevy Blazer.

The steering wheel angle vs. lateral acceleration numbers indicate that the UN46 at both tire pressures requires the highest steering wheel angle input to maintain a lateral acceleration level. The UN46 at both tire pressures, also requires the highest steering wheel angle input to maintain a lateral acceleration level in right turns as compared to the Bronco II and Chevy Blazer.

The steering wheel angle vs. lateral acceleration plots indicate that the UN46 with tire pressure of 35/35 psi starts to develop large understeer at about -.55 G's for left turns. In left turns the Bronco II, Chevy Blazer and UN46 @ 26/26 psi all begin extreme understeer at about -0.6 G's or above. The Chevy Blazer reaches the highest lateral acceleration level before extreme understeer occurs. In right turns for the steering wheel angle vs. lateral acceleration plots all the vehicles seem to have similar shape with understeer increasing gradually to about 0.4 G before beginning a more rapid increase. The understeer starts to increase dramatically between 0.5 and 0.6 G depending on the vehicle. The Blazer requires the least steering wheel angle to attain any cornering levels. The Bronco II requires similar angles to the Chevy Blazer.

For left turns the steering wheel torque vs. lateral acceleration plots reveal that the Blazer is the only vehicle that gives an indication that the vehicle is approaching, or is in extreme understeer. This can be seen by the decrease in steering wheel torque which gives feedback to the driver. The Bronco II and UN46 both have increasing steering wheel torque which does not give any feedback to the driver. In right turns all the vehicles have a decrease in steering wheel torque in extreme understeer.

Special notes on the vehicles. Front left tire lift was observed in the left turn of the Constant Radius Test with the Bronco II. This occurred at lateral acceleration levels above about -0.63 G's. The UN46 @ 26/26 psi experienced extreme understeer at the higher G levels.

To summarize the Constant Radius Handling Test results, the Chevy Blazer displays the most favorable constant radius handling characteristics. The Blazer has very low front jacking, moderate steer torque gradient, and symmetric body roll between turns.

B. RANDOM STEERING METHOD

The comparison plots in Appendix A. contain the frequency response functions of each output parameter (yaw rate, lateral acceleration, roll angle) with respect to steering wheel angle at 45 and 60 mph for the test weight. In addition, the frequency response plots of roll angle with respect to lateral acceleration are also included. The plots for each individual vehicle are contained in Appendices B, C, and D. The frequency response plots include magnitude, phase and lag time functions. Some important parameters are summarized in Table 2 for the 45 mph test speed, and Table 3 for the 60 mph test speed.

The vehicle properties associated with the shapes of these curves applies only to the linear or "normal" driving range of the vehicle performance near the test speed, although extrapolation of vehicle character extends into the nonlinear range in many cases. Vehicles with good (i.e. sporty) handling characteristics exhibit flatter frequency response curves of both yaw rate and lateral acceleration with the "knee" or downturn of the curve at a higher frequency and they have lag time curves that are lower and flatter than a poor handling vehicle. This constant gain factor and short time lag independent of how fast the steering wheel is turned is believed to be associated with sporty vehicle handling characteristics.

One method of quantifying the frequency response curves that has been suggested in the literature uses the frequency at which the lateral acceleration frequency response is reduced by 3 dB and the frequency at which the yaw rate frequency response curve shows a resonant peak to characterize a vehicle response. In each, a higher frequency, in general represents a desirable yaw rate frequency response. Another factor used to determine "flatness" is the peak to steady state ratio of the parameter. In this case a lower number indicates a flatter curve. Other researchers use the lag time at a 45 degree phase shift to quantify handling quality. In this case a shorter time is more desirable. Table 2 and 3 shows the results of these analysis at all the test conditions. In general, these methods work well to categorize gross vehicle differences but more subtle changes require analysis of the whole functions as described in a previous paragraph.

The comparison graph's in Appendix A show that the Chevy Blazer 4x4 has the flattest yaw rate frequency response curve. The peak frequency of all the vehicles are similar. The yaw rate peak to steady state magnitude ratio is lower for the Chevy Blazer as compared to the other vehicles tested. This parameter is a measure of yaw damping, and in conjunction with the -3 dB down point also gives an indication of flatness. The Bronco II and Chevy Blazer have the widest bandwidth of the vehicles. Looking at the yaw rate frequency response graph and these two parameters show the UN46 @ tire pressure of 26/26 psi has the peakiest yaw rate response and the least favorable yaw rate response of the vehicles tested. The yaw rate frequency response curve for the Blazer does not fall as quickly as the UN46 at either tire pressure and the Blazer has a higher frequency content than the other vehicles. All of this shows that the Blazer has the most predictable and flattest yaw rate frequency response, and the UN46 @ 26/26 psi has the least of the vehicles.

The time delay plots for yaw rate/steering wheel angle in Appendix A show that below 1 Hz. the Chevy Blazer has the longest lag time of all the vehicles. Above 1 Hz. the lag times are comparable for all the vehicles. But the Blazer also has the flattest time delay curve of any of the other vehicles, which is more important than a low lag time as long as the response time is not too long. A vehicle that displays a quick change in lag time is less predictable than a vehicle with a flat time delay curve. The time delay curve for yaw rate/steering wheel angle at 60 mph shows that the problem is worse than at 45 mph. The Bronco II and UN46 display similar yaw rate/steering wheel angle time delay curves.

The time delay plots of yaw rate to lateral acceleration in Appendix A provide an indication of the lag and lead relation between yaw rate and lateral acceleration. When the curve is positive, the yaw rate leads the lateral acceleration and the vehicle yaws prior to moving laterally. A low constant lead time is thought to indicate a favorable handling vehicle. The Chevy Blazer followed closely by the Bronco II have the lowest lead times, with the UN46 at both tire pressures having the highest. The UN46 @ 35/35 psi is slightly quicker than the UN46 @ 26/26 psi.

The frequency response function of lateral acceleration to steering wheel angle curves in Appendix A show that all the vehicles have similar lateral acceleration response shapes. The UN46 @ tire pressure of 26/26 psi has the widest bandwidth for lateral acceleration frequency response. The Chevy Blazer has the highest gain. All the vehicles exhibit a hump before the downturn in the curve. This is unusual and the cause is not known. The hump is larger on the UN46 and Bronco II than on the Blazer. The frequency response curves all fall off at similar rates, so there isn't a major difference in the frequency response curves between the vehicles.

The time delay plots of lateral acceleration to steering wheel angle show that like the time delay plot of yaw rate to steering wheel angle, the Chevy Blazer has the longest time delay below about 1 Hz. The Blazer also has the flattest time delay curves which make it the most predictable vehicle of the four tested for this parameter.

The roll to lateral acceleration frequency response curves display a major difference between vehicles. The amplitude of the roll resonant for the UN46 at both tire pressures are the highest of the vehicles tested. The amplitude and width of the peak indicate roll damping. Roll damping is greatest on the Blazer followed by the Bronco II. The UN46 @ 26/26 psi has the least roll damping. All the roll resonant frequencies are grouped between 2.3 and 2.5 Hz. The Bronco II has the highest roll resonant frequency at both speeds with 2.4633 Hz. at 45 mph and 2.5024 Hz. at 60 mph. All of these numbers are listed in Tables 2 and 3.

The test results show that all the test parameters degrade as the vehicle speed is increased from 45 to 60 mph.

The test results show the Chevy Blazer 4x4 has more favorable Random Steer handling characteristics than the other vehicle tested.

14

EXP3 1025

From: RSTORNAN--DRBN001 Date and time 09/12/89 09:01:29
To: CWHITE --DRBN001

FROM: Roger F. Stornant
Subject: UN46 Steering Linkage Issue - Index Bars

UN46 with P225 tire on both 2 dr and 4 dr was literally "bullet-proof" (i.e., no 2 wheel lift on long or short course with "saturation" tendency similar to T-Blazer). The 4 dr with the P235 ATX tires was significantly better than BII, especially on the short course where it was impossible to generate 2 wheel lift (on the long course,"reserve" was 3 mph, better than BII's 0 mph reserve).

However, the 2 dr with P235 ATX tires performed similarly to the BII on both the short and long courses. Addition of the lowered front roll center gave the P235 tire performance similar to the P225 even without the increased track width. Based on the variability of the test, as demonstrated by our own drivers, it is possible to pass the CU test with the P235 tires; however, if we were using the CU test as sign-off requirement, we would not accept this combination (P235 ATX & 2dr).

In the "real world", tire size has not been demonstrated to be a significant factor; in fact, analysis of the FARS incidents would suggest that larger tires may be an advantage (reduced tendency for rim-road contact). Our analysis would indicate that the Explorer will have much better FARS performance than BII regardless of tire size due to it's longer wheelbase, increased understeer and slower dynamic response (also a WB effect).
Regards,
Roger F. Stornant
*** Forwarding note from CWHITE --DRBN001 09/11/89 16:01 ***
To: RSTORNAN--DRBN001 R. F. Stornant

FROM: Charles White
Subject: UN46 Steering Linkage Issue - Index Bars
Isn't is also true that the UN46 is better than BII in CU test even with P235?

Isn't it also true that UN46 with P235 is much better than BII with P205 in real world FARS analysis standpoint (longer wheelbase, etc.)?
*** Forwarding note from RSTORNAN--DRBN001 09/11/89 12:20 ***
To: CWHITE --DRBN001

FROM: Roger F. Stornant
Subject: UN46 Steering Linkage Issue - Index Bars
I believe my attached note to RRS will answer your question on "What tire issues?".
Regards,
Roger F. Stornant
*** Forwarding note from RSTORNAN--DRBN001 09/11/89 12:18 ***
To: RSIMPSO1--DRBN001

FROM: Roger F. Stornant
Subject: UN46 Steering Linkage Issue - Index Bars

Nothing new on tires. Our tests indicate a high confidence of passing CU with P225 tires and less confidence on the P235. All tires meet engineering J-Turn test. I believe new info is that our competitors are recognizing CU Test as a requirement and have designed their new utility vehicles to meet. OGC is concerned we will be only OEM with a vehicle that has a significant chance of failing the CU test. I believe that management is aware of the potential risk w/P235 tires and has accepted risk. CU test is generally unrepresentative of real world and I see no "real" risk in failing except

what may result in way of spurious litigation.

From an engineering standpoint, I am not comfortable with the warning label approach to avoid use of an index bar. I do not believe we could even count on B&AO to orient correctly, much less service personnel; however, if you obtain ASO concurrence in this approach, I will go along.
Regards,
Roger F. Stornant
*** Forwarding note from RSIMPSO1--DRBN001 09/11/89 11:01 ***
To: RSTORNAN--DRBN001

*** Reply to note of 09/11/89 09:55
FROM: Roger R. Simpson
Subject: UN46 Steering Linkage Issue - Index Bars
IN MY MIND, THERE IS SUFFICIENT RATIONALE TO ELIMINATE ALL OF THE INDEX BARS IF A DECAL ON THE LINKAGE IS EMPLOYED. LET'S DISCUSS.

REGARDING TIRES, I THINK TRUCK SHOULD STAND ON IT'S ORIGINAL POSITION. IS THERE ANY NEW INFORMATION THAT WOULD CAUSE A CHANGE?

cc: WGILLIES--DRBN001 CWHITE --DRBN001

Regards,
Roger R. Simpson

cc: RCAMPBEL--DRBN001 DWOTTON --DRBN001
DHOUST01--DRBN004

From: CWHITE --DRBN001 Date and time 09/11/89 16:20:20
To: DHOUST01--DRBN004

FROM: Charles White
Subject: UN46 TIRE SELECTION
We still plan to offer P225 and P235 tires as agreed some weeks ago. This is not a competitive reaction as much as it is a case of:

- UN46 with P235 tires is better than BII with P205 tires and BII is a safe vehicle.

BII

-The CU test is not representative what is happening in the real world and UN46 is much better than UN46 in real world comparison too (longer wheelbase, etc.) -LTPD plans no change to current tire offerings or plans. There is no plan for down the road changes to UN46 (after Job 1, '90 1/2) on this matter.

If ASO has knowledge of new facts (beyond just "G2") I suggest you setup mtg accordingly.
*** Forwarding note from DHOUST01--DRBN004 09/11/89 10:49 ***
To: CWHITE --DRBN001

FROM: David R. Houston
Subject: UN46 TIRE SELECTION
IF THE "G2" INFO THAT RFS REFERRED TO IN HIS PROFS NOTE IS CORRECT, WE SHOULD BE CONSIDERING MORE CHANGES TO THE UN46 TO ALLOW LARGER TIRES THAN THE P225'S. WE MAY END UP THE ONLY KID ON THE BLOCK THAT CAN'T PASS THE CU TEST.

BY THE WAY, HOW'S PROGRESS ON ADDITIONAL ROLL RESISTANCE TESTING GOING (SINGLE OR DOUBLE LANE CHANGE TYPE MANEUVERS)? IF WE DON'T EXACTLY LIKE THE CU TEST (FOR ALL THE PREVIOUSLY NAMED REASONS), WHAT ARE WE GOING TO DO TO GET SOMETHING LIKE IT IN OUR CORPORATE QUALIFYING TEST ARSENAL???????
CC: RSTORNAN AHOWLAND

Regards,
David R. Houston
PHONE X41312, FAX X25457, PROFS ID "DHOUST01"

From: CWHITE --DRBN001 Date and time 09/11/89 17:54:59
To: DHOUST01--DRBN004

FROM: Charles White
Subject: ROLL OVER TEST DEVELOPMENT
Yes, we are adding a double-lane change to our PVS, I'm not sure which parameters we have picked interms of distance and speeds but it will be a double-lane change. Of course, it will not be the CU procedure, since it is too "compact" and driver-influenced.

RFS: Pls send Dave and I status on specifics of incorporating the double-lane change and when it will be in place.
*** Forwarding note from DHOUST01--DRBN004 09/11/89 17:45 ***
To: CWHITE --DRBN001

FROM: David R. Houston
Subject: ROLL OVER TEST DEVELOPMENT

CC:RSTORNAN AHOWLAND

ARE THERE ANY PLANS TO DEVELOP ADDITIONAL "ENGINEERING TEST REQUIREMENTS" FOR DETERMINING VEHICLE ROLLOVER RESISTANCE, IN ADDITION TO THE "J-TURN" TEST, AND CURRENT SIMULATION ANALYSIS?

AT ONE TIME I THOUGHT YOU WERE CONSIDERING SOMETHING LIKE THE "RIVARD" TEST. DO THE PLANS STILL INCLUDE THIS, AND IF SO WHAT IS THE TIME TABLE FOR ITS DEVELOPMENT AND USE?

Regards,
David R. Houston
PHONE X41312, FAX X25457, PROFS ID "DHOUST01"

cc: RSTORNAN--DRBN001 R. F. Stornant

From: DHOUST01--DRBN004 Date and time 09/11/89 10:49:25
To: CWHITE --DRBN001

FROM: David R. Houston
Subject: UN46 TIRE SELECTION
IF THE "G2" INFO THAT RFS REFERRED TO IN HIS PROFS NOTE IS CORRECT, WE SHOULD BE CONSIDERING MORE CHANGES TO THE UN46 TO ALLOW LARGER TIRES THAN THE P225'S. WE MAY END UP THE ONLY KID ON THE BLOCK THAT CAN'T PASS THE CU TEST.

BY THE WAY, HOW'S PROGRESS ON ADDITIONAL ROLL RESISTANCE TESTING GOING (SINGLE OR DOUBLE LANE CHANGE TYPE MANEUVERS)? IF WE DON'T EXACTLY LIKE THE CU TEST (FOR ALL THE PREVIOUSLY NAMED REASONS), WHAT ARE WE GOING TO DO TO GET SOMETHING LIKE IT IN OUR CORPORATE QUALIFYING TEST ARSENAL???????
CC: RSTORNAN AHOWLAND

Regards,
David R. Houston
PHONE X41312, FAX X25457, PROFS ID "DHOUST01"

From: RSTORNAN--DRBN001 Date and time 09/11/89 09:55:10
To: CWHITE --DRBN001 RSIMPS01--DRBN001

FROM: Roger F. Stornant
Subject: UN46 Steering Linkage Issue - Index Bars
Based on testing performed by Carron last week, it appears that resolution of the index bar concern is near. At this time, index bars will not be required on any 4x4 models and only on one side of the 4x2 models. Carron believes that, with minor re-design of the stabilizer bar link, only one index bar will eventually be required (a full complement of index bars is 4 per linkage ... 2 on each side, @ appox. $2.50 per bar thus the $10 value for a complete linkage). With this approach, we would probably launch with a pair of bars on the 4x2 linkage and shortly after Job #1 go to the single bar with an UN46 average cost effect of < $1. B&AO is currently reviewing the imapct of this proposal but, because a single bar does not significantly hamper the tie rod adjustment process, they are expected to buy-in to both the short term (two bars on one side) and long term (one bar on one side) plan.

Final resolution is expected for later this week. Other actions required are proceeding for Job #1 according to plan.

I have heard via the "grapevine" that OGC is arming themselves for one more attempt to revise the intial tire release plan. They have heard that Nissan and Toyota are designing their utility vehicles to meet the CU test (GM already meets). I understand they will be asking us to restrict to the P225 tire and make additional changes to increase confidence in the optional tires.

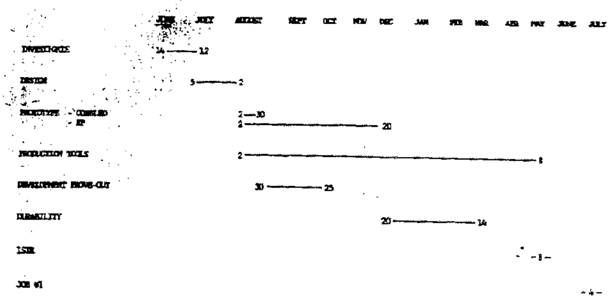
cc: DHOUST01--DRBN004

Regards,
Roger F. Stornant

Proposedd UN-46 Chassis
Design Modifications

	Est. Timing	S.I. Affect
Lower Vehicle ¾" Frt. & Rr.		.04
• Restrike Frame Flange	20 wks	
• Redesign Jounce Bumpers and Attachments	20 wks	
Widen Track 2"		.06
• New Wheel and/or Frt. & Rr. Axles	30/40	
Lower Front Roll Ctr. 2"		.04
• Use Hi-Rise Axle Pivot Brkt	Avail	
• New Steering Linkage & Pitman Arm	20	
• Increased Sector Shaft XR-50 Gear	36	
Increase Roll Stiffness		.04
• New Front Springs	12	
• Potential FESM Structure Upgrade	26	

REDESIGN TIMING



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CONCLUSIONS

* The UN46 is expected to have superior performance in the field compared to Bronco II

* The UN46 meets all the corporate requirements for roll over with all tires that will be released.

* There is a risk that testing by Cousumer's Union will indicate that the UN46 is very similar to the Bronco II. The speeds on the short course for two wheel lift are essentially the same as Bronco II. The UN46 has a greater difference between the speed at which it knocks down pylons and the speed at which it begins to lift two wheels than the Bronco II. If CU tests each vehicle by starting at low speed and gradually increasing speed until pylons are knocked down, the UN46 will show improvement over the Bronco II. If the vehicle is tested by starting at the fail speed of the Bronco II or the highest pass speed of the S10, then there is very little margin before two wheel lift.

* The CU test proceedure will "fail" tire/vehicle/chassis combinations that will pass the J-Turn and other Ford handling requirements.

* Chassis changes can be made to the UN46 which will enable it to equal or almost equal BIC when tested on the CU proceedure.

RECOMMENDATIONS

Since the UN46 is improved in real world (FARS projections and Ford testing) but may not pass the CU test procedure it is recommended to:

* Utilize as many of the chassis revisions as possible without delaying Job 1.

* Verify the improvement in UN46 with the actions that support job #1.

* Incorporate additional revisions as running changes within one year after production.

* Immediately begin engineering/manufacturing on all revisions and filanize the timing plan.

Roger
for your file. Jim A.

TO: J. Avouris
R. Campbell

T.O. Number	N23281
Date of Order	3/31/89
Test Auth. No.	
Work Task No.	T9L10
File Code	
Test Dates	4/19 to 4/24/89
Date Reported	5/10/89

SUBJECT: J-Turn performance of three 4X4 vehicles; a 1989 Ford Bronco II, a prototype UN46 and a 1989 Chevrolet Blazer S-10.

REQUESTED BY: Light Truck Chassis Dynamic Systems Activity - J. Avouris, Requester

OBJECT: To measure the steering wheel angle, lateral acceleration, yaw rate, roll angle, longitudinal speed and lateral speed and to determine the rollover tendency of three subject vehicles, at two loading conditions and with a number of different tires constructions and sizes, in a J-turn maneuver at speeds up to 55 MPH.

SUMMARY OF TEST RESULTS: The Bronco II, the Blazer S-10 and the UN46 prototype with the base tire and suspension did not establish a roll over response during any of the J-turn maneuvers at speeds up to and including 55 MPH. The UN46 prototype demonstrated a roll over response, established by observing two wheels off the ground and/or outrigger contact, with a number of tire, tire pressure, suspension configurations at the heavy load condition. A complete summary of the roll over response is included in Table 1.

D.S.Starr, Research Engineer
NVH Ride & Handling Development
NVH & Advanced Technology Dept.

VEHICLE DESCRIPTION:

Make and Model:		1989 Ford Bronco II Veh. No. 316T656
Wheelbase:		94.1 inches
Track:		Front: 57.0 inches Rear : 57.0 inches
Suspension Type;		Front: Twin I beam with anti-roll bar Rear: Live axle with anti-roll bar
Engine:		2.9L V-6
Transmission:		5 speed manual and transfer case
Steering System:		Power
Tires:		Firestone FR480 P205/75R15 M&S
Tire Pressure		Front; 35 psi Rear ; 35 psi
Test Weights:		light...GVWR
	Left Front =	1055...1045 lbs.
	Right front=	1016... 989 lbs.
	Left rear =	988...1145 lbs.
	Right rear =	957...1102 lbs.
	Total =	4006...4281 lbs.
Weight Distribution:		(light) 51.7% F / 48.3% R (GVWR) 47.5% F / 52.5% R
Ride Heights:		curb .... gvw w/o w/driver. outrigger
	Left Front =	3.57..... 3.83 inches
	Right front=	3.45..... 3.65 "
	Left rear =	4.17..... 2.62 "
	Right rear =	4.16..... 2.60 "

Wheel Lip to Ground Heights:	curb..... w/driver.	gvw w/o outrigger
Left Front =	30.90....	31.20 inches
Right front=	31.15....	31.42 "
Left rear =	29.00....	27.20 "
Right rear =	29.15....	27.25 "

Bottom of rim to Ground:	curb..... w/driver.	gvw w/o outrigger
Left Front =	4.58.....	4.58 inches
Right front=	4.65.....	4.63 "
Left rear =	4.56.....	4.33 "
Right rear =	4.66.....	4.38 "

Frame to Ground:	curb..... w/driver.	gvw w/o outrigger
(Reference to front end sheet metal mounting bracket)		
Left Front =	19.10....	19.90 inches
Right front=	19.00....	19.85 "
(Reference to rear spring shackle bracket)		
Left rear =	18.70....	16.36 inches
Right rear =	18.72....	16.35 "

Frame Angle: (+ when frame down in front)	curb..... w/driver.	gvw w/o outrigger
Left =	+ 0.3....	- 0.9 degrees
Right =	+ 0.3....	- 1.0 "

Ride Height Weights:	curb..... w/driver.	gvw w/o outrigger
Left Front =	964...	925 lbs.
Right front=	929...	899 lbs.
Left rear =	946...	1230 lbs.
Right rear =	929...	1221 lbs.
Total =	3768...	4275 lbs.

Front Alignment: (curb + driver)	left.....	right
Camber =	-0.1.....	-0.1 degrees
Caster =	3.9.....	4.2 "
Toe in =	-0.01....	0.01 inches

Other: Tires were new at the start of testing and were replaced when needed.

VEHICLE DESCRIPTION:

Make and Model:		UN46 2-Dr. prototype Veh. No. 316T008
Wheelbase:		102.5 inches
Track:		Front: 58.6 inches Rear : 58.4 inches
Suspension Type:		Front: Twin I beam with anti-roll bar Rear: Live axle with anti-roll bar
Engine:		4.3L V-6
Transmission:		automatic and transfer case
Steering System:		Power
Tires:		Firestone (1) P225/70R15 AS (2) P235/75R15 ATX (3) P235/75R15 AS (4) P245/70R15 AS
Tire Pressure		Front; 26,30,35 psi Rear ; 26,35 psi
Test Weights:		light...GVWR
	Left Front =	1243...1189 lbs.
	Right front=	1110...1096 lbs.
	Left rear =	1099...1270 lbs.
	Right rear =	1073...1273 lbs.
	Total =	4525...4828 lbs.
Weight Distribution:		(light) 52.0% F / 48.0% R (GVWR) 47.3% F / 52.7% R
Ride Heights:		curb .... gvwr w/o w/driver. outrigger
	Left Front =	2.54..... 2.26 inches
	Right front=	3.40..... 3.20 "
	Left rear =	4.86..... 3.16 "
	Right rear =	5.38..... 3.35 "

Wheel Lip to Ground Heights:	curb..... w/driver.	gawr w/o outrigger	
Left Front =	32.30....	32.25	inches
Right front=	33.25....	32.45	"
Left rear =	32.40....	30.45	"
Right rear =	33.15....	30.40	"

Bottom of rim to Ground:	curb..... w/driver.	gawr w/o outrigger	
Left Front =	5.22.....	5.23	inches
Right front=	5.24.....	5.15	"
Left rear =	5.35.....	5.05	"
Right rear =	5.29.....	4.95	"

Frame to Ground:	curb..... w/driver.	gawr w/o outrigger	
(Reference to front end sheet metal mounting bracket)			
Left Front =	18.80....	18.75	inches
Right front=	19.00....	18.95	"
(Reference to rear spring shackle bracket)			
Left rear =	19.40....	17.55	inches
Right rear =	19.98....	17.72	"

Ride Height Weights:	curb..... w/driver.	gawr w/o outrigger
Left Front =	1178....	1170 lbs.
Right front=	1042....	1174 lbs.
Left rear =	983....	1356 lbs.
Right rear =	948....	1392 lbs.
Total =	3768...	4275 lbs.

Front Alignment: (curb + driver)	left.....	right	
Camber =	-0.6.....	-0.6	degrees
Caster =	5.5.....	4.9	"
Toe in =	0.01....	-0.01	inches

Other: Tires were new at the start of testing and were replaced when needed. Tires and pressures were varied as documented in report.

\jturn 5/11/89

VEHICLE DESCRIPTION:

Make and Model:	1989 Chevrolet Blazer S-10 Sport Veh. No. 309T653
Wheelbase:	105.5 inches
Track (with aluminum whls)	Front: 56.5 inches Rear : 55.0 inches
Track (with steel whls)	Front: 61.3 inches Rear : 59.5 inches
Suspension Type:	Front: SLA with anti-roll bar Rear: Live axle with anti-roll bar
Engine:	4.3L V-6
Transmission:	automatic and transfer case
Steering System:	Power
Tires:	Uniroyal (stock) P235/750R15 Firestone (UN46 tires) (1) P205/70R15 AS (2) P245/70R15 AS
Tire Pressure	Front; 35 psi Rear ; 35 psi
Test Weights:	light...GVWR
Left Front =	1199...1190 lbs.
Right front=	1101...1096 lbs.
Left rear =	1037...1206 lbs.
Right rear =	1035...1208 lbs.
Total =	4272...4700 lbs.
Weight Distribution:	(Light) 52.6 F / 47.4% R (GVWR) 48.6% F / 51.4% R

INSTRUMENTATION:

- ·Humphrey Gyroscopic Platform No. CF70-0101-1 (serial number H1) to measure corrected lateral acceleration and roll angle. The unit was mounted where the front passenger seat is normally located. The distance from the front axle spin center to the accelerometer was 47 inches for each of the vehicles
- ·Humphrey Yaw Rate Gyro No. RG51-0106-1 (full scale range = ±30 deg/sec)
- ·Sensor Development Steering Wheel Angle and Torque Transducer Model 01002-1 (Car #2)
- ·Correvit L-head to measure longitudinal velocity
- ·Correvit H-head to measure lateral velocity at the rear bumper position
- ·Signal Conditioning Package
- ·Kyowa RTP-501 phillips cassette type FM Recorder to record data

TEST PROCEDURE AND RESULTS:

All vehicle tests were conducted at the handling pad of APG at light and heavy (GVWR) loads. The light load consists of the vehicle, driver and instrumentation. The heavy load is the light load plus full passenger load and up to 250 lbs. of cargo located behind the rear seat location, without loading the rear axle beyond its GAWR (gross axle weight rating). All tests were conducted with outriggers installed on the front and rear bumper mounts. Other non OE safety equipment installed in the vehicles included a custom fabricated roll cage, competition driver seat and 6 point competition harness restraint system.

The J-turn maneuver was conducted by driving at a constant speed (40,45,50 and 55 MPH), putting the vehicle in neutral and then rapidly steering to a preselected steering angle. Steering angles used were 180, 270 and 360 degrees. A steering stop was used to assure no overshoot. Fast steering inputs of over 500 degrees per second were attained. Data was collected during each run and wheel lift and outrigger observations were recorded.

The test matrix and roll over responses are described in Table 1. Plots of the 50 and 55 MPH tests and complete test logs are attached.

It should be noted that some of the plots for the steering wheel angle channel on the Bronco II and UN46 are misleading. A transducer malfunction caused the signal to indicate a -360 degree negative angle intermittently (usually during the transient ramp up of the signal). This makes determination of the ramp rate of steering wheel angle impossible on these runs. For a typical example look at the steering wheel angle trace for run #5 of the UN46. You will note the actual steer angle starts at 0° and at about 14 seconds starts to ramp up to -180°. You will note that the angle appears to overshoot to about -360 before returning to -180°. This was not the case as a steering stop was used. Similar phenomena occur in other runs. Therefore when using the steering wheel angle channel information care should be used.

VEHICLE	WEIGHT	TIRE	TIRE PRESSURE	ROLL
Bronco II	heavy light	Firestone FR480 P205/70R15	35 / 35	no no
UN46	heavy	Firestone AS P245/70R15	35 / 35 26 / 26	yes yes
UN46	heavy	Firestone ATX P235/75R15	35 / 35 26 / 26 30 / 35	no no yes
UN46	heavy	Firestone FR480 P225/70R15	35 / 35 30 / 35	no no
UN46 no rear bar	heavy	Firestone FR480 P225/70R15	35 / 35	yes
UN46	light	Firestone FR480 P225/70R15	35 / 35	no
UN46	light	Firestone ATX P235/75R15	35 / 35 26 / 26	no no
UN46	heavy	Firestone AS P235/75R15	35 / 35	yes
Blazer S-10	heavy	Uniroyal P235/75R15	35 / 35	no
Blazer S-10	heavy	General P205/75R15	35 / 35	no
Blazer S-10	heavy	Firestone FR480 P245/70R15 steel wheels	35 / 35	no
Blazer S-10	light	Uniroyal P235/75R15	35 / 35	no
Blazer S-10	light	General P205/75R15	35 / 35	no
Blazer S-10	light	Firestone FR480 P245/70R15 steel wheels	35 / 35	no

Table 1: J-turn Test Matrix and Roll Over Response

UN46 ANALYSIS

Listed below are the hardware improvements on UN46:

Front Wheel Rates	Increased 16% (135 TO 191)	RANGER springs
Rear Wheel rates	Increased 30% (135/265 to 178/273)	
Front Sta Bar	1" (may be reduced to 15/16)	
Rear Sta Bar	3/4 TO 5/8 pending final front bar	
Ride Heights		
Front	No Change	
Rear	Reduced by .5 in. (3.3 TO 2.8)	
Tire line up	No Change	

The improvements in stability are shown in ATTACHMENT I

ADAMS criteria have been met for the Two Door(Worst Case) 4X4 and 4X2 on 225 tir. At 35psi the ADAMS criteria is not being met with the 245 and 235 tire. There is good subjective correlation sith ADAMS analysis on the 225 tires; therefore, we expect to get a favorable ADAMS analysis for 245 tires at 26 psi. Initial ADAMS analysis with estimated tire coefficients for the 245 tire at 26 psi will be complete mid-February --Final analysis is scheduled by the end of February with CALSPAN data.

OPEN ISSUES

The use of High Performance tires, such as the Firehawk instead of the released 225 FR480 tire will result in poor performance based on subjective and ADAMS predictions.

Similar performance issues occur with the 235 and 245 tires at 35 psi. The 4 door, due to its longer wheel base is more tolerant of these tires than the 2 door.

In both cases the outside front tire does not saturate and very high cornering loads can build up. with lower pressure in the large tires of with the FR480 225 tire, the tires saturate and increase understeer.

UN-46 TIRE PRESSURE LIMITATION

LOAD

	MAX AXLE LOAD	TIRE CAPACITY		EXCESS
	35 psi	26 psi		
UN-46 P245 & P235	2900 (REAR)	3686	3186	286 @ 26 psi
BII P205	2750 (FRONT)	2905	____	155

Position: At 26 psi the UN-46 has more excess capacity than the current BII @ 35 psi

WEAR

88 BII		88½ BII		90½ UN-46 245	
P205		P205		35 psi	26 psi
BASE	◆	+ 126%	◆	+ 16%	03/15/89

Position: Wear at 26 psi is expected to deteriorate slightly

RR CAFE

Total RL HP

88½ BII		90½ UN-46 P245	
p205		35 psi	26 psi
4X2	15.4	16.7	17.1 est.
4X2	16.1	17.9	18.3 est.

Position: The increase in total RLHP is projected to be 0.4 which could be recovered from the lowering of the vehicle.

CUSTOMER WARNING

To assure that the customer is aware of pressure limitations an additional tire pressure label (similar to those used in passenger cars) attached either to the glove box door or B pillar is being proposed. The owner's manual and other customer literature like "4-Wheeling" is being upgraded to emphasize correct tire pressure. Similar situations exist today in station wagons where pressure splits front to rear are necessary for handling. The Nissan Pathfinder and Nissan Partol also call for tire pressures significantly lower than the maximum allowed.

Position: The adequacy of the added labeling is being reviewed with OGC and ASO on February 6, 1989

ms
trprslmt.rjb

ATTACHMENT I

STABILITY INDEX

	4X4	4X2
UN46 2DR	2.17 18.3/2647	2.17 ↓ 2.09
UN46 4 DR	2.17	2.16
BRONCO II	2.13	2.07

ADAMS ANALYSIS

The detail on the next page indicates that UN46 is more understeering than the Bronco II (6.42 deg/G for UN46 vs 4.86 for BII).

The UN46 has slightly more roll than BII (6.5 DEG/G vs 5.1 DEG/G)

During Transient maneuvers, one front tire lifts and there was approximately 200 lbs on the inside rear tire. Lateral acceleration of .75 G'S was achieved during the transient maneuvers.

With the high performance tires, much greater lateral acceleration and consequently two wheel lift was noted.

C:\RMC\UN462.2

DRAFT

UN46 DEVELOPMENT STATUS

Improvements in handling have been made during recent development of the UN46. There are hardware, program, and ride trade-offs associated with this improvement. Further improvement is desired, especially in the 4x4 - 2 door.

The hardware changes which have resulted in the best vehicle to date are:

- Ranger front spring rates
- P225/70R15 tire maximum (delete P235 and P245)
- Reduce front tire pressure from 35 psi to 30 psi

Future actions to be evaluated which are expected to give further improvements are:

- Revised rear spring rates (increase proportional to front, CG effect approximately .20 inch)
- Optimization of rear stabilizer bar with new rear springs.
- Revised RGAWR to reflect the following loadings:
    - 2 + 2 + 150 lbs. for 2 door models
    - 2 + 3 + 150 lbs. for 4 door models

  (rear spring rating to support load specified, CG effect could be .30 - .60 inch)

Long term action includes increasing track width.

Open issues to the program:

- Marketing implications of tire size limitation
- Fuel economy and tire wear effect of reduced front tire pressure
- Ride / Durability effects of stiffer rear springs
- Acceptability of reduced RGAWR

Open issues to further development:

- Prototype availability; only 2 of 4 vehicle models have been evaluated, measured or analyzed.
- Latest schedule indicates a reduction, not an increase in Ride/Handling prototype availability.
- Prototype hardware; revised rear springs not available for at least 8 weeks (February '89).

Attachments:

- Subjective evaluation summary
- Measured data for understeer coefficients and vehicle roll

FLASUM.U46/MAR

Subject: UN46 Status **DRAFT/PRELIMINARY**

Overview:
Current "strategies" for development of utility vehicle stability have changed over the past few years due the increased availability of rollover accident data and analyses. Previous strategies were partially driven by the Insurance Institute tests of the Jeep CJ7 in the early 80's which emphasized risk from rollovers caused by extreme (rate and magnitude) steering inputs in emergency maneuvers. Independent DOT, GM and Ford studies have confirmed that rollovers directly induced by extreme steering inputs are rare for any Utility vehicle (including the CJ7). The following quote from GM's recent SAE Paper (Reconstruction of Rollover Collisions, SAE 890857), summarizes current wisdom ... "A common pre-rollover maneuver is an off-road path by the car, followed by heavy steer correction back towards the road leading to a side slide, and, ultimately, a trip followed by the rollover". Based on this new information, the UN46 was developed using a handling philosophy notably different from the BII. A comparison of BII and UN46 handling strategies is summarized below:

Model	Response	Cornering Capacity	Body Roll
BII	"Quick" steering and moderate understeer for good response and minimal tire "squeal". Develop vehicle for high speed through lane change pylons.	Maximize for good accident avoidance capability and fast "lap times" on handling track.	Minimize for "flat" feel and high cornering confidence.
UN46	Reduce steering gain and increase understeer to slow steering response. This will increase driver feedback (more tire "squeal") and reduce sensitivity to driver over-correction (common with drivers "under the influence").	Not to exceed current BII levels. Limit cornering capacity with larger tires through suspension revisions and tire pressure reduction.	Increase body roll to reduce cornering confidence and thereby discourage aggressive driving.

Parametric Comparison:

	2 dr UN46		4 dr UN46		'89 BrII		S-Blaz(4x4)		Path/Fdr
Parameter	4x2	4x4	4x2	4x4	4x2	4x4	Std	Opt	4x4
Avg. Track Width	58.1	58.3	58.1	58.3	56.9	56.9	55.8	55.8	55.6
C.G. Height (curb)	26.9	26.8	27.1	27.1	27.5	26.7	25.7	25.7	26.3
Stability Index	2.16	2.17	2.14	2.15	2.07	2.13	2.17	2.17	2.11
Versace Metric 1/	.349	.348	.336	.336	.3760	.3650	.3459	.3459	.3447
Roll Gain (°/g)	TBD	5.6	TBD	5.7	N/A	3.7	6.9(e)	N/A	9.0
U/steer @ .3g (°/g)	TBD	6.5	TBD	TBD	N/A	4.4	4.2	N/A	3.2
U/steer @ .6g (°/g)	TBD	TBD	TBD	TBD	N/A	19.8	24.6	N/A	9.8
Overall Str Ratio	19:1	19:1	19:1	19:1	19:1	19:1	20:1	20:1	20:1
Wheelbase	102.1	102.1	111.9	111.9	94.0	94.0	100.5	100.5	104.3
WB/Tan(20°/SR) 2/	463.0	463.0	507.5	507.5	426.3	426.3	479.8	479.8	497.9
Engine Disp.	4.0L	4.0L	4.0L	4.0L	2.9L	2.9L	2.8L	4.3L	2.9L
Horsepower	170	170	170	170	140	140	125	160	139
Curb Weight	3576	3791	3719	3907	3278	3371	3217	3267	3715
HP/Weight 3/	.048	.045	.046	.044	.043	.042	.039	.049	.037

1/ This a measure of stability that shows high correlation with actual FARS rollover data. Unlike the "Stability Index", this measure includes wheelbase effects (important for "directional stability") ... lower is "better".

2/ This is an analytical measure of steering gain. The smaller the value, the "quicker" is the perceived steering response.

3/ High power/weight is believed to promote aggressive driving.

[illegible] Test Status:
Due to inconsistencies with the computer analysis program ADAMS, the UN46 2 Dr 4X4 will be signed-off for rollover stability by actual "limit" testing at the Arizona Proving Grounds (April 18th to 29th). Testing will include an '89 S-10 Blazer with 4.3L engine along with a current production BII 4x4. The BII provides an essential "baseline" for UN46 Rollover Stability sign-off because our analysis of the BII FARS data indicates almost no propensity for rollover during "handling" maneuvers. Testing will begin at relatively low speed (40 mph) and steer angles (90 deg.) and gradually increase to 55 mph and 360 deg. to establish the limit "threshold". The UN46 must at least be equivalent to the BII in these maneuvers to be considered acceptable for production.

Track Handling (Non-limit Subjective):
The UN-46 2 door and 4 door models, both 4x2 and 4x4, exhibit track handling performance superior to the 1989 Bronco II models. Evaluations on the handling and serpentine courses demonstrate that the vehicle body roll induced during increasingly severe maneuvers provides ample feedback to the driver of impending limit conditions. Increased understeer during severe cornering reduces the lateral acceleration and enhances control. The UN-46 models are superior to the Bronco II for all available options, including tires currently released for the program. The UN-46 models have been rated superior to the Chevrolet S-10 Blazer and Nissan Pathfinder for overall subjective handling.

Tire Pressure Reduction:
Engineering has recommended use of tire pressures below maximum allowable inflation levels for all UN46 tires. As described previously, the reduced tire pressures increase understeer and reduce maximum cornering capacity (both "stabilizing" influences). This practice has been used routinely in heavy duty pick-up truck and car station wagon applications to assure adequate understeer under all loading conditions. Nissan (Pathfinder), Toyota, Chevrolet, and Dodge also reduce tire pressures for selected applications. While we cannot be sure of their reasons, similarities in vehicle loading suggest that maintaining a minimal level of understeer under rear-loaded conditions may be the compelling factor.

Summary:
Based on an analysis of FARS accident summaries and BII & Competitive handling characteristics, it is impossible to identify any type of vehicle "defect" that could explain the BII FARS performance. It is most likely that the handling strategy used during the development of the BII, which fully exploited the vehicles inherent quickness (due to its short wheelbase), encourages aggressive driving and makes the vehicle more sensitive to the large steering wheel "over-corrections" that seem to be part of most rollover scenarios. This sensitivity is aggravated by the fact the most operators in rollover accidents are either inexperienced drivers, under the influence of alcohol or both. The UN46, designed with the benefit of the FARS experience for all utility vehicles, has been intentionally developed to resolve these issues.

Subject: UN46 Handling/Stability Status DRAFT/PRELIMINARY

Parametric Comparison:

	2 dr UN46		4 dr UN46		'89 BrII		S-Blaz(4x4)		Path/Fdr
Parameter	4x2	4x4	4x2	4x4	4x2	4x4	Std	Opt	4x4
Engine Disp.	4.0L	4.0L	4.0L	4.0L	2.9L	2.9L	2.8L	4.3L	2.9L
Horsepower	170	170	170	170	140	140	125	160	139
Curb Weight	3576	3791	3719	3907	3278	3371	3217	3267	3715
HP/Weight	.0475	.0448	.0457	.0435	.0427	.0415	.0389	.0490	.0374
Overall Str Ratio	19:1	19:1	19:1	19:1	19:1	19:1	20:1	20:1	20:1
Wheelbase	102.1	102.1	111.9	111.9	94.0	94.0	100.5	100.5	104.3
WB/Tan(20°/Str.Ratio)	463.0	463.0	507.5	507.5	426.3	426.3	479.8	479.8	497.9
Avg. Track Width	58.1	58.3	58.1	58.3	56.9	56.9	55.8	55.8	55.8
C.G. Height (curb)	26.9	*	*	27.9	27.5	26.7	25.7	25.7	26.3
Stability Index	2.16	*	*	2.09	2.07	2.13	2.17	2.17	2.11
Versace Metric @	.3492	*	*	.3454	.3760	.3630	.3459	.3459	.3447 — LOWER [illegible]
Roll Gain (°/g)	*	*	*	*	N/A	3.7	6.9(e)	N/A	9.0
U/steer @ .3g (°/g)	*	*	*	*	N/A	4.4	4.2	N/A	3.2
U/steer @ .6g (°/g)	*	*	*	*	N/A	19.8	24.6	N/A	9.8

*: Measurements in process. @:Versace Metric$=(H/(T*L)^{1/2})$

Analysis Status:

ADAMS Results on the 2 dr. 4x4 and 4 dr. 4x2 predict two wheel liftoff in J-Turn @ 55 mph with P225/70 and P245/70 A/S tires (criteria is no more than one wheel lift). This results from a higher than expected CG, high cornering capability of the larger 70-series tires, and a reduced side-view inclination of the roll axis (due to underslung rear suspension). Changes are being considered in "rise-to-curb", stabilizer bar rates, option content, and steering/suspension geometry & compliance to provide acceptable performance.

Test Status:

Track handling on early prototype vehicles has demonstrated front wheel lift under a variety of sub-limit (<.7 g's) conditions. Testing of EP vehicles will begin the week of 11/28 in Florida. ADAMS derived fixes will be evaluated during this evaluation. Performance equal to or better than the BII is the objective.

FARS Analysis ... Effect on UN46 Development:

Our analysis of FARS results indicates no propensity for the BII to rollover under "on-road" handling-induced maneuvers. Our analysis of 129 FARS accident reports revealed only 1 rollover that could have been handling-induced (appears to have resulted from a series of rapid lane changes at high speed). In the majority of remaining on-road incidents, the vehicle entered the paved surface already "out of control", severely yawing or sliding across the road surface (typical for all utility vehicles). We have concluded that our current stability criteria are adequate and will be used, as is, for the UN46.

Because the majority of FARS incidents occur when the vehicle is sliding sideways and trips, ejecting unrestrained occupants, the major handling focus to reduce FARS must be to keep the vehicle axis parallel to the direction of travel. The BII was developed to take advantage of its short wheelbase and provide a highly responsive and maneuverable vehicle. Recognizing that many of the FARS incidents occur with inexperienced drivers with high blood alcohol levels, this maneuverability that was intended to allow a driver to avoid an accident may result in "overcorrection" and loss of control for the typical FARS driver. The following comparison of the UN46 and BII illustrate a change in handling strategy that we believe will have a favorable impact on FARS.

Model	Response	Cornering Capacity	Body Roll
BII	Moderate understeer for good response and minimal tire "squeal". Develop for high speed through lane change pylons.	Maximize for good accident avoidance capability and fast "lap times" on handling track.	Minimize for "flat" feel and high cornering confidence. Enhances "dynamic" stability index.
UN46 (current)	Same - Some reduction expected due to change in wheelbase.	Same - Increase vs. BII expected due to larger, more powerful tires.	Same - May be limited by capability of FESM structure.
UN46 (proposed)	Increase understeer in all conditions to promote slightly less "neutral" feel and increase warning from front tires. Will reduce speed through pylons.	Not to exceed current BII levels. Limit Capacity with larger tires through suspension revisions.	Increase body roll to S-Blazer levels. This will improve off-road ride but will decrease D.S.I.. Decrease cornering confidence to discourage aggressive driving.

SUBJECT: 1990 Explorer Handling Stability

BACKGROUND: Compact Utility Vehicles, as a class, are receiving increased attention from NHTSA and Consumer Groups in part due to FARS (Fatal Accident Reporting System) data quoted by Consumer Reports magazine. The Bronco II has been singled out for criticism by CU due to its alleged poor Fars record among Compact Utility vehicles and poor performance in their "Double Lane Change" test procedure. The 1990 Explorer has been designed to achieve the best possible handling stability given the fundamental constraints imposed by the vehicle package and suspension "type". Summarized below are parametric and functional comparisons of the Bronco II, Explorer and Chevrolet T-Blazer (generally recognized as B-I-C in Rollover Stability based on FARS and CU testing).

PARAMETRIC COMPARISON:

	Bronco II	Explorer	T-Blazer
Stability Index	2.13	2.19	2.17
Tread	56.9	58.3	56.5frt/55rr
Wheelbase	94	102 & 112	101
Base Tire	205/75R15	225/70R15	205/75R15

To achieve the stated values, the Explorer has been lowered to the maximum extent possible. The relatively high engine position of the Explorer, unchanged from Bronco II, prevents further significant improvement in Stability Index without extensive suspension, frame and sheetmetal revisions.

ENGINEERING STABILITY TESTS:

Ford Light Truck began using the J-Turn Test as its principal stability test with the introduction of the Bronco II. This test was copied from the Insurance Institute testing of the Jeep CJ5. The Bronco II and Explorer pass the J-Turn test at speeds up to 55 mph and at steer angles up to 360 deg. at maximum expected steer rates (Light Truck objective). While the BII was unable to pass the test with P215 tires, the Explorer has passed this test with P245 tires (one tire size larger than the maximum tire released). The Chevy T-Blazer passes J-Turn requirements with an apparent large margin of "reserve". The difference in "reserve" between the Explorer and T-Blazer in the J-Turn test has been traced to the differences in front suspension "roll center". The higher roll center of the Explorer reduces the effectiveness of the roll control devices (results in a transient roll overshoot) and dynamically raises the CG. No reduction in roll center is possible without major revision to the front suspension and steering systems.

CONSUMERS UNION TEST (run by Light Truck):

The Consumers Union test became an implicit requirement for the Explorer due to the potential for adverse publicity. There are many attributes of the test (especially driver variability) that cause it to be a poor tool to predict "Real World" rollover stability. The Explorer with the base tire performs significantly better in the CU test than the Bronco II. With the optional tire, the 2 dr. Explorer is approximately equal to the present Bronco II, while the 4 dr is slightly better. The Nissan Pathfinder and Dodge Raider had slightly inferior results vs Bronco II. The T-Blazer appears significantly better than all the other vehicles for this maneuver. There is some risk that, due to variability of the test, the Explorer (especially the 2dr tested with optional tires) will receive a poor rating if production vehicles are tested by Consumer's Union.

EXPECTED ROLLOVER STABILITY IN THE "REAL WORLD":

Neither parametric analyses or stability tests are, by themselves, good predictors of "real world" rollover statistics. Based on studies of FARS accidents conducted by Light Truck, ASO and outside consultants, driver demographics, wheelbase and steering sensitivity must be heavily weighed in any attempt to project FARS performance. While the Bronco II has FARS statistics in the "middle-to-poor" range, the Explorer is expected to be "near B-I-C". The reasons for this include:

1.) Longer Wheelbase and substantially slower steering response with more understeer (protects the driver from "over-correction", the cause of most rollover accidents.

2.) Improved driver demographics. With the high (80/20) mix of 4dr vehicles, we can expect a less aggressive driver profile with a corresponding reduction in all accident statistics.

Explorer Tire DNP

The purpose of this note is to provide current status on reference subject.

Background.-

In July 1997 FoV representatives were called to a meeting in Caracas with a group of independent lawyers representing four (4) customers.

The objective of this meeting, as expressed by these lawyers, was to draw Ford attention to a situation related to their customers, but that they felt could be greater.

The situation described was that several Explorer (2dr and 4dr) would turn over unexpectedly as a consequence of a tire explosion.

Based on this information, known cases and several newspaper clippings (depicting similar situations). At least sixty (60) cases have been identified. Issue has a high fatality rate. FoV initiated a joint investigation with local and US based Firestone technical personnel.

The result of this investigation where inconclusive, although several findings were made:

- Venezuela drivers have very little conscious of tire maintenance. A significant number of vehicles evaluate had low tire pressure.
- No defects were seen on either mounted tires or samples of failed tires; 117 vehicles in three different regions were inspected.
- Ten (10) failed tires were inspected. Root cause of failure varied from tread loss, to tire puncture, to wheel deformation.
- Failed tire were either local or US import manufacture.
- High incidence vehicle roll over after a tire blow out or tread loss has not been detected for other vehicle brands;. Toyota, GM and Chrysler all have significant presence in this market segment.

Beginning first quarter of 1999, FoV notified this situation to Explorer PVT and the TVC.

TVC notified of a similar issue occurring in GCC, where WDMO was about to initiate a DNP consisting of a tire change to Goodyear brand.

FoV Actions.-

- To correct another claim related rear axle skate and handling at high speeds (140 km/h), FoV implemented in May 1999 a for Australia only shock absorber calibration.
- To align with GCC DNP and to improve Explorer market image, FoV introduced the same GCC Goodyear tire for all new Explorer, beginning July 1999.
- FoV has issued a TSB on rear axle skate/high speed handling. This TSB authorizes dealer to change complete set of shock absorbers to Australia only calibration on customer complaint.
- FoV may also authorize tire change (to Goodyear) to any customer with relevant claims on vehicle handling. No TSB has been issued.
- FoV has proposed a local DNP (only Venezuela) to handle this issue, consisting of a Tire and shock absorber change to all vehicles in the field produced since MY 1996 to Sept. 1999 when Goodyear tires where introduced locally for Explorer. Australian calibration shocks where incorporated in July 1999. Estimated cost US $ 8.528.576 (5.405.000 for tires and 3.123.576 for shocks).

~~Future actions.-~~

On hold for FRC (Field Review Committee) approval of local DNP.

Comments.-

Root cause of issue has yet to be established. TVC support will be needed if this objective is to be pursued.

Local DNP process approval by FAO has been lengthly.

Word of mouth and several newspaper articles, editorials and radio talk shows have been affecting Explorer image.

The DNP process needs to be accelerated so that issue can be contained.

F1046-93(1997)e1 Standard Guide for Preparing Artificially Worn Passenger and Light Truck Tires for Testing

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1. Scope

1.1 This guide outlines the preparation of artificially worn tires by tread rubber removal (cutting or grinding, or both) for subsequent performance testing. The purpose is to permit the preparation of test tires with a uniformly reduced tread groove depth and tread geometry that will yield repeatable test results while avoiding the time-consuming and costly over-the-road natural wearing of tires.

1.2 The values stated in SI units are to be regarded as the standard. The values given in parentheses are for information only.

1.3 This standard does not purport to address all of the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to use.

Adopted by:
Developed by ASTM Subcommittee: F09.20

Ordering Information

Price: $ 25.00 Printed Pages: 3

The information above is only a summary of the ASTM standard. Order the complete standard in three ways:

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Mail Delivery - North America: $ 25.00
Mail Delivery - International: $ 27.50

Mail Delivery

Subject Index

apparatus; artificially worn; light truck tires; passenger tires; procedure; testing

Support Desk

		BFS	
TEST	**MINIMUM REQUIREMENT**	**PRODUCTION QUALIFICATION**	**PROCEDURE**
DOT HIGH SPEED	30' @ 85 MPH	6 MIN. @ 95 MPH	RUN TO FAILURE
SAE HIGH SPEED "S" RATING	10' @ 112 MPH	5 MIN. @ 118 MPH	RUN TO FAILURE
DOT ENDURANCE	34 HRS @ 50 MPH	41 HRS. @ 50 MPH	RUN TO FAILURE OR 54 HRS.

CONFIDENTIAL
ENTIRE PAGE

INDOOR DURABILITY TESTING

TEST NO	TST COD	SIZE	TST SERIAL	SPEC NO	DSH NO	DURA	REM SPD	MILES/ BURST PSI	REM [illegible]	REM 1 DESCR	REM 2	REM 3	CONF	FINAL STEP HRS	FINA STEP MIN	REMOV LOAD	DATE COMPLETED
[redacted]																	
TEST NAME: TREAD SEPARATION TEST																	
J25410	14	P215/75R15	W2HF1PJ057	267193	010	-	0050	40000	H05	RNF			Y	-	-	-	1997-03-21
J25411	14	P215/75R15	W2HF1PJ057	267193	011	-	0050	40000	H05	RNF			Y	-	-	-	1997-03-20
J25412	14	P215/75R15	W2HF1PJ047	267193	012	-	0050	40000	H05	RNF			Y	-	-	-	1997-03-21
J25414	14	P215/75R15	W2HF1PJ057	267193	014	-	0050	40000	H05	RNF			Y	-	-	-	1997-03-20
J25415	14	P215/75R15	W2HF1PJ057	267193	015	-	0050	40000	H05	RNF			Y	-	-	-	1997-03-20
J25416	14	P215/75R15	W2HF1PJ057	267193	016	-	0050	40000	H05	RNF			Y	-	-	-	1997-03-20
[redacted]																	
H4724	14	P235/75R15		[illegible]	[illegible]	-	[illegible]	35095	D37	CB			Y	-	-	-	1990-01-12
H4725	14	P235/75R15		SL531J	42	-	0050	40000	H05	RNF			Y	-	-	-	1990-01-18
H7786	14	P235/75R15		SM420D	19	-	0050	6825	D25	TCO	D47		Y	-	-	-	1990-08-22
H7787	14	P235/75R15		SM420D	09	-	0050	15400	D47	SETP			Y	-	-	-	1990-08-30
H7788	14	P235/75R15		SM420D	10	-	0050	13000	D25	TCO	D47		Y	-	-	-	1990-08-29
H7800	14	P235/75R15		SM421D	11	-	0050	14025	D25	TCO	D47		Y	-	-	-	1990-08-30
H7801	14	P235/75R15		SM421D	10	-	0050	6690	D47	SETP			Y	-	-	-	1990-08-29
H7802	14	P235/75R15		SM421D	02	-	0050	8225	D25	TCO	D47		Y	-	-	-	1990-08-29
H8393	14	P235/75R15		SM528D	2	-	0050	29525	D47	SETP			Y	-	-	-	1990-10-31
H8394	14	P235/75R15		SM528D	4	-	0050	22700	D47	SETP			Y	-	-	-	1990-12-18
H8395	14	P235/75R15		SM528D	08	-	0050	28020	D47	SETP	D67		Y	-	-	-	1991-01-04
H8405	14	P235/75R15		SM529D	2	-	0050	22135	D47	SETP	D67		Y	-	-	-	1990-12-26
H8406	14	P235/75R15		SM529D	05	-	0050	25175	D47	SETP	D67		Y	-	-	-	1991-01-07
H8407	14	P235/75R15		SM529D	03	-	0050	21275	D47	SETP	D67		Y	-	-	-	1990-12-03
H8537	14	P235/75R15		SM420D	20	-	0050	4900	D25	TCO	D47		Y	-	-	-	1991-01-16
H8538	14	P235/75R15		SM420D	29	-	0050	6910	D25	TCO	D47		Y	-	-	-	1991-01-09

REDACTED

TIRE
MAINTENANCE
WARRANTY
AND
SAFETY
MANUAL

Firestone

"LIMITED WARRANTY" Firestone Brand Passenger and Light Truck Tires

TIRES AND USES COVERED

This warranty covers all new Firestone brand passenger tires including radial passenger tires with Self Seal. the TEMPA SPARE. the LIMITED SERVICE SPARE. and the new Firestone brand truck tires as listed in our "Light Truck Tire and Tube Price List." Tires branded "Blem" are not warranted for ride or appearance. Tires marked "NA" or "NO ADJ" are not warranted.

WHO GETS THE WARRANTY, WHAT IS WARRANTED AND FOR HOW LONG?

If. before wearing down to 2/32nds of an inch of tread depth remaining (i.e.. worn down to the top of the built-in indicators in the tread grooves). any tire covered by this warranty becomes unusable for any reason within the manufacturer's control. such tire will be replaced with an equivalent new Firestone tire on the basis set forth below. Some examples of causes or conditions normally beyond the manufacturer's control are:

1. Road hazards. (for example: puncture. cut. snag. stone drill. impact or bruise break) or damage from curbing or wheel spinning;
2. Apparent overload or improper inflation pressure;
3. Wheel misalignment. tire/wheel assembly imbalance. or other vehicle conditions. defects. or characteristics;
4. Mounting damage. racing. or other abuse;
5. Improper repair or improper insertion of sealant. balancing. or filler materials;
6. Intentional alteration of either the appearance or the physical characteristics of the tire;
7. Conditions caused by aging or improper storage; and
8. Failure to observe any of the safety and maintenance precautions contained in this manual.

This warranty is in addition to and/or may be limited by any other applicable written warranty covering special tires or situations you may have received.

REPLACEMENT PRICE

Radial passenger and light truck tires adjusted under this warranty will be replaced free of charge during the first 25% of treadwear or within the first 12 months after purchase (Proof of Purchase and Purchase Date are required) whichever is to owner-user's advantage.

Non radial passenger and light truck tires adjusted under this warranty will be replaced free of charge during the first 10% of treadwear.

During the free replacement period. mounting and balancing of passenger tires only are included.

After the free replacement period. to determine the replacement price. the percent of used treadwear is multiplied by the owner-user's regular buying price. Taxes. mounting. balancing. or other service charges will be added to the adjustment replacement price.

IN CANADA. the tire will be adjusted at dealerships (subject always to dealer discretion) at a predetermined "Adjustment Price"

REPLACEMENT WARRANTY. If you receive a tire under this warranty. it will be covered by the warranty Firestone then gives on that tire.

WHERE TO GO. See your Firestone retailer listed in the Yellow Pages under Tire Dealers — Retail.

CONSUMER RIGHTS. This warranty gives you specific legal rights. and you may also have other rights which vary from state to state and in Canada from province to province

CONDITIONS AND EXCLUSIONS

TO THE EXTENT PERMITTED BY LAW. FIRESTONE DISCLAIMS LIABILITY FOR ANY CONSEQUENTIAL DAMAGES. LOSS OF TIME OR LOSS OF VEHICLE USE. OR INCONVENIENCE.

Some states do not allow the exclusion or limitation of incidental or consequential damages. so the above limitation or exclusion may not apply to you.

This warranty applies only to consumers actually using the tire and adjustments made in the United States or Canada.

Firestone's obligations under this policy may not be enlarged or altered by anyone.

IMPORTANT: In accordance with Federal Law. this warranty has been designated as a "Limited Warranty." Nothing in this warranty is intended to be a representation by Firestone that tire failures cannot occur.

OWNER-USER'S OBLIGATION

It is the owner-user's obligation to operate tires within tire load and specification limits and at cool air pressures specified by your vehicle manufacturer for load and speed according to individual tire size, type and load capacity. It is also the owner-user's obligation to maintain proper alignment of wheels, and to maintain proper tire/wheel assembly balance.

In case of adjustment claim, owner-user must present the tire to a Firestone retailer, complete and sign the customer section of the Firestone adjustment claim form, and pay appropriate replacement price, taxes and service charges.

We strongly recommend that you have your Firestone retailer inspect tires any time you notice irregular or uneven treadwear, or every 6,000 to 8,000 miles. This service is free.

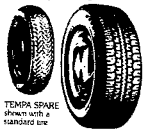
Given in U.S.A. by:		Given in Canada by:
Firestone Tire Division of Bridgestone/ Firestone, Inc. 1200 Firestone Parkway Akron, Ohio 44317	and	Bridgestone/Firestone Canada, Inc. 5770 Hurontario St. Suite 400 Mississauga, Ontario L5R 3G5

THE FIRESTONE TEMPA SPARE*

...a revolutionary space-saving spare tire

- Fully inflated and mounted on its own wheel...always ready for use.
- About half the size of a conventional spare...provides more usable storage space in your trunk.
- Weighs less than a regular tire, so it's easier to handle.

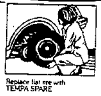
TEMPA SPARE* is a special tire designed to let you finish a trip and obtain a replacement tire, if needed, at your convenience.

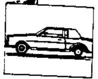

TEMPA SPARE shown with a standard tire

The TEMPA SPARE is smaller and thinner than a regular tire, which means you have more space in your trunk for luggage, golf clubs, children's equipment, etc. Check your inflation pressure.

INSTRUCTIONS FOR USE

Remove TEMPA SPARE from trunk. Check inflation pressure every 30 days and adjust to 60 psi


Replace flat tire with TEMPA SPARE

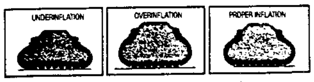

Your car is now ready for temporary use

IMPORTANT SAFETY INFORMATION

Any tire, no matter how well constructed, may fail in use as a result of punctures, impact damage, improper inflation, overloading, or other conditions resulting from use or misuse. Tire failure may create a risk of serious personal injury or property damage. To reduce the risk of tire failure, we strongly recommend you read and follow all safety information contained in this manual.

TIRE INFLATION

Always keep the recommended air pressure in all your tires, including the spare. This is an important requirement for tire safety and mileage. **Your vehicle tire placard or owner's manual will tell you the recommended air pressure.** On some vehicles, the recommended front and rear tire pressures will be different. Your Firestone retailer will be happy to point this out to you.



SAFETY WARNING: Driving on tires with too little air pressure is dangerous. Your tires will get over-heated. This can cause a sudden tire failure that could lead to serious personal injury.

Underinflation may also:
1. damage the tire leading to tire failure.
2. adversely affect vehicle handling.
3. reduce tire life.
4. increase fuel consumption.

SAFETY WARNING: Driving on tires with too much air can be dangerous. The tires are more likely to be cut, punctured, or broken by sudden impact. On some vehicles, handling characteristics can be seriously affected. Serious personal injury could result. Consult your vehicle tire placard for the recommended inflation and your owner's manual for other tire information.

SAFETY WARNING: Never inflate a tire unless it is secured to the vehicle or a tire mounting machine. Inflating an unsecured tire is dangerous. If it bursts, it could be hurled into the air with explosive forces resulting in serious personal injury.

TIPS FOR SAFE TIRE INFLATION

- Check your tire air pressure, including your spare tire, at least once a month and before long trips. Be sure to use an accurate pressure gauge.
- Check your air pressure when the tires are "cold." The tires are "cold" when your vehicle has been driven less than a mile at moderate speed after being stopped for three or more hours.
- If you must add air when your tires are hot, add four pounds per square inch (psi) (28 kPa) above the recommended cold air pressure. Recheck the inflation pressure when the tire is cold.
- Never release air from a hot tire in order to reach the recommended cold tire pressure. Normal driving causes tires to run hotter and air pressure to increase. If you release air when your tires are hot, you may dangerously under-inflate your tires.
- If your tires lose more than two pounds per square inch (psi) (14 kPa) per month, the tire, the valve, or wheel may be damaged. Consult your local Firestone store or tire dealer for a free inspection.
- Check your spare tire also. Consult your vehicle owner's manual for the correct inflation and use of a "temporary use" spare tire.

OVERLOADING

SAFETY WARNING: Driving your vehicle in an overloaded condition is dangerous. Overloading causes excessive heat to build up in your tires. This can lead to sudden tire failure and serious personal injury while the tire is overloaded or at some later date.

TIPS FOR SAFE LOADING

Consult your vehicle tire placard and owner's manual for the vehicle load limits, proper tire inflation, and special trailer towing instructions that apply to your vehicle and tires.

- Never exceed the maximum load rating stamped on the sidewall of your tire or the maximum vehicle load rating, whichever is less. The maximum vehicle load rating (GVWR) is found on the certification label on the driver's door.

TIRE DAMAGE

SAFETY WARNING: Driving on damaged tires is dangerous. A damaged tire can suddenly fail causing serious personal injury. Have your tires regularly inspected by your Firestone retailer for damage.

TIPS FOR SPOTTING DAMAGED TIRES

- After striking anything unusual in the roadway, ask your Firestone retailer to demount the tire and inspect it for damage. A tire may not have visible signs of damage on the tire surface. Yet, the tire may suddenly fail without warning, a day, a week, or even months later.
- Inspect your tires for cuts, cracks, splits, or bruises in the tread and sidewall areas. Bumps or bulges may indicate a separation within the tire body. Have your tire inspected by a qualified tire service person. It may be necessary to have it removed from the wheel for a complete inspection.
- Inspect your tires for uneven wear. Wear on one side of the tread or flat spots in the tread may indicate a problem with the tire or vehicle. Consult your Firestone retailer.
- Inspect your tires for adequate tread depth. When the tire is worn to the built-in indicators (2/32 inch, 1.6 millimeters, or less tread groove depth) or the tire cord or fabric is exposed, the tire is dangerously worn and must be replaced immediately.
- Inspect your tire rims also. If you have a bent or cracked rim, it must be replaced.

TIRE REPAIRS

SAFETY WARNING: Driving on an improperly repaired tire is dangerous. The repair can cause further damage to the tire. It may suddenly fail, causing serious personal injury. To be safe, go to your Firestone retailer for proper tire repairs.

- Never repair a tire with less than 2/32 inch (1.6 millimeters) tread remaining. At this tread depth, the tire is worn out and must be replaced.
- Never repair a tire with a puncture larger than 1/4 inch (6.4 millimeters) in diameter. Such tires cannot be properly repaired and must be replaced.
- Repairs of all tires (radial and non-radial) must be of the plug and inside patch type unless the hole is too small to insert a plug. Using plugs alone on any type of tire is not a safe repair.
- Never repair a tire with a puncture or other damage outside the tread area. Such tires cannot be properly repaired and must be replaced.

- Any tire repair done without removing the tire from the rim is improper.
- Tubes, like tires, should be repaired only by a qualified tire service person.
- Never use a tube as a substitute for a proper repair.

REMOVING AND REPLACING TIRES ON RIMS (TIRE MOUNTING)

SAFETY WARNING: Always stand well clear of any tire mounting operation. This is especially important when the service operator inflates the tire. If the tire has been improperly mounted, it may burst with explosive force causing serious personal injury.

A new valve must be installed in the rim each time a worn out passenger tire is replaced.

SAFETY WARNING: Removing and replacing tires on rims can be dangerous. Attempting to mount tires with improper tools or procedures may result in a tire explosion causing serious personal injury. This is a job for your Firestone retailer or qualified tire mechanic only.

Personal injury can result from:

1. Failure to select the proper tire and rim.

   The tire must match the width and diameter requirements of the rim. For example, when mounting 16-inch diameter tires, use only 16-inch diameter rims. When mounting truck type radial tires, use only wheels approved for radial tires.

2. Failure to inspect both the tire and rim.

   The rim must be free of cracks, dents, chips, and rust. The tire must be free of bead damage, cuts, and punctures.

3. Failure to follow proper procedures.

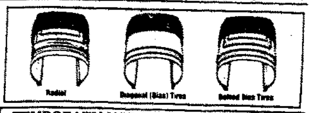
   For proper mounting procedures, consult the **Care and Service of Automobile Tires** or the **Care and Service of Highway Truck Tires** published by the Rubber Manufacturer's Association.

4. Exceeding the maximum bead seating pressure.

   The service mechanic must never inflate a tire beyond 40 pounds per square inch (psi) (276 kPa) to seat the beads. Be absolutely certain beads are fully seated before adjusting inflation pressure to the level recommended for vehicle operation.

TIRE MIXING

SAFETY WARNING: Driving your vehicle with an improper mix of tires is dangerous. Your car's handling characteristics can be seriously affected. You could have an accident resulting in serious injury. Consult your vehicle owner's manual or Firestone retailer for the proper tire replacement.



TEMPORARY-USE SPARE TIRES

Your car may be equipped with a "temporary use" spare tire. This spare may differ in size and construction from the other tires on your vehicle.

SAFETY WARNING: Check inflation pressure before use. See Tire Inflation Section in this manual.

SAFETY WARNING: Placing (mounting) your temporary use tire on a wheel which is not specifically designed for use with the temporary use tire or placing another type tire on your temporary use wheel can be dangerous. Your vehicle's handling characteristics can be seriously affected. You could have an accident resulting in serious personal injury. Consult your vehicle owner's manual for proper use of your "temporary use" spare tires.

HIGH SPEED

SAFETY WARNING: Driving at high speed is dangerous, and can cause a vehicle accident, including serious personal injury or death.

1. Regardless of the speed and handling capabilities of your car and its tires, a loss of vehicle control can result from exceeding the maximum speed (a) allowed by law or (b) warranted by traffic, weather, vehicle, or road conditions. High-speed driving should be left to trained professionals operating under controlled conditions.
2. No tire, regardless of its design or speed rating, has unlimited capacity for speed, and a sudden tire failure can occur if its limits are exceeded.
   - (a) Non-speed-rated tires are built for ordinary passenger service, and should never be used for high-speed driving.
   - (b) Even "speed-rated" tires may not be safely driven at speeds exceeding their maximum actual speed capability. The following information should help you understand the tire speed rating system and use speed-rated tires safely.

3. LT (Light Truck) Designated Tires Only:
It is not recommended that your truck be operated at speeds in excess of legal limits. However, if it is anticipated that sustained driving at speeds in excess of 65 MPH may be required, then:

(a) At speeds from 66 MPH through 75 MPH (106 KM/H through 121 KM/H), cold inflation pressures must be increased 10 PSI (70 KPA) above the recommended pressures for the load being carried. Do not exceed the maximum inflation pressure of the wheel. Sustained speeds from 66 MPH through 75 MPH are not permitted when the 10 PSI increase would exceed the wheel's maximum inflation pressure.

(b) For sustained driving at speeds from 76 MPH through 85 MPH (122 KM/H through 137 KM/H), reduce axle load capacity by 10% in addition to increasing the inflation pressure as listed in (A) above.

NOTE: LT tires should not be operated at speeds in excess of 85 MPH (137 KM/H).

TIRE SPEED RATINGS

Some tires, especially "performance" tires, bear a letter "speed rating" designation indicating the tire's design speed capability. This speed rating system is intended to allow you to compare the speed capabilities of tires.

When purchasing or replacing speed-rated tires, make sure to:
(a) use the rankings in the chart below to compare the speed ratings of all the tires, and
(b) follow the vehicle manufacturer's recommendations, if any, concerning the use of speed-rated tires.

To avoid reducing the speed capability of the vehicle, replace a speed-rated tire only with another tire having at least the same speed rating. Remember, it's the "top speed" of the "slowest" tire on the car which cannot be exceeded without risk of tire failure.

The letter symbols and corresponding design speeds are as follows:

Speed-Rating Symbol	Speed Category
S	Up to 112 mph (180 km/h)
T	Up to 118 mph (190 km/h)
H	Up to 130 mph (210 km/h)
V (with service description)	Up to 149 mph (240 km/h)
V (no service description)	Over 130 mph (210 km/h)*
Z	Over 149 mph (240 km/h)*

*Although no upper-limit speeds are specified here, the indicated tires nonetheless have limited rated speed capabilities. For more detailed technical information, call Firestone at 1-800-356-4644.

These speed ratings are based on laboratory tests under specific, controlled conditions. While these tests relate to performance on the road under those conditions, remember that real-life driving is rarely identical to any test conditions. Your tire's actual speed capability may be less than its rated speed, since it is affected by factors such as inflation pressure, load, prior alteration or damage, driving conditions, alignment, wear, vehicle condition, and the duration for which high speed is sustained.

A tire's speed rating becomes void if the tire is repaired, retreaded, damaged or abused, or otherwise altered from its original condition. Thereafter, it should be treated as a non-speed-rated tire.

The tire's speed rating designation appears on the tire sidewall with the tire size. Examples:

P215/65R15 88H   P205/60TR15 90T   185/70SR13

In these examples, the "H," "T," and "S" respectively, are the speed ratings ("R" indicates that each of the example tire sizes are radials). The "88H" and "90T" in the first two examples are called "service descriptions."

TIRE SPINNING

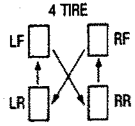
SAFETY WARNING: Spinning a tire to remove a vehicle stuck in mud, ice, snow, or wet grass can be dangerous. A tire spinning at a speedometer reading above 35 miles per hour (55 km/h) can in a matter of seconds reach a speed capable of disintegrating a tire with explosive force. Under some conditions, a tire may be spinning at a speed twice that shown on the speedometer. This could cause severe injury to a bystander or passenger and extensive vehicle damage. Never spin tires above a speedometer reading of 35 mph (55 km/h).

SAFETY WARNING: Spin balancing a tire at speeds exceeding a vehicle speedometer reading of 35 mph (55 km/h) [70 mph (115 km/h) if the tire is being balanced off of the vehicle or if your vehicle is equipped with a limited slip differential] can be dangerous. The tire may fail with explosive force causing serious personal injury. Only trained personnel should spin balance tires. You should stand well away from the work area when tires are being spin balanced.

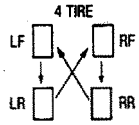
RADIAL TIRE ROTATION
PASSENGER CAR TIRES

The purpose of tire rotation is to minimize irregular or uneven wear caused by maintaining a tire in one rotation direction and one position over an extended period. The following rotation patterns are normally recommended for radial passenger tires:

REAR WHEEL DRIVE



FRONT WHEEL DRIVE



Some exceptions to these patterns may exist. See your owner's manual for recommended pattern.

Follow the vehicle manufacturer's recommendations for the mileage interval for tire rotation. If the vehicle manufacturer's recommendations cannot be found, tires should be rotated every 6,000 to 8,000 miles. Individual tire pressures must be checked after rotation and adjusted to the vehicle manufacturer's recommendation for the new location on the vehicle. Vehicle alignment should be checked if irregular wear is evident.

TIRE STORAGE

Tires should be stored indoors in a cool dry place where water cannot collect inside the tires. The tires should be placed away from electric generators and motors and sources of heat such as hot pipes. Storage surfaces should be clean and free of grease, gasoline, or other substances which can deteriorate the rubber. Improper storage can damage your tires in ways that may not be visible and can lead to serious personal injury.

TIRE SERVICE/ CUSTOMER SATISFACTION

Normal tire maintenance and warranty services are available at Firestone retailers across the U.S.A. and Canada. For more information, please call our Customer Relations Department (1-800-356-4644). In Canada (1-416-890-1990).

Additional information on the care and service of automobile tires is available by writing to the:

Rubber Manufacturer's Association
1400 K St., N.W.
Washington, DC 20005
or
Rubber Association of Canada
89 Queensway West, Suite 308
Mississauga, Ontario L5B 2V2

TIRE REGISTRATION

Registration of your tires is an important safety precaution since it allows the manufacturer to notify you in the event of a recall. When you purchase replacement tires at a store owned by a tire manufacturer (e.g., Firestone) or tire brand name owner, the retailer will register the tires for you. When you purchase tires at an independent tire dealer, however, you will be provided with a registration card on which the tire serial numbers have been recorded. Be sure to fill in your name and address on this card and mail it promptly.

You need not register tires which come as original equipment on new vehicles, as the vehicle and tire manufacturers handle that for you.

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As Ud 4.1.99

CARR ENGINEERING, INC.
12500 CASTLEBRIDGE DRIVE HOUSTON, TEXAS 77065-4532
TELEPHONE: 281/894-8955
FAX: 281/894-5455

January 23, 1999

Mr. Lee Mickus
Wheeler Trigg & Kennedy
1801 California Street
Suite 3400
Denver, CO 80202

Re: Van Etten v. Ford

Dear Mr. Mickus:

Per your request, Carr Engineering, Inc. has investigated the crash that led to the referenced lawsuit. As part of that investigation I have analyzed the complaint, miscellaneous interrogatories, police report, laser copies of police photographs, vehicle information, documents produced by Bridgestone/Firestone, medical information, laser copies of photographs, drawing by Newton Bates, vehicle invoice, vehicle repair invoice, DelRay Toyota documents, and the scheduling order. In addition, I have analyzed the reports by Dr. Mel Richardson and Dennis Carlson as well as depositions of Michael Van Etten, Kim Van Etten, Rethema Ivy, Dina Karwoski, Matthew Wilson, Carlos Osequeda, Khori Ivey, Lester Bruce, Trooper Gary Thrift, Lt. Charles Byerly, and Dr. Mel Richardson. Carr Engineering, Inc. has also inspected the Ford Explorer and the crash scene and has conducted evaluations and tests of the handling and stability characteristics of a Ford Explorer 4 door 4x2 vehicle substantially the same as the one involved in this crash.

Based on the investigation to date, the following opinions and conclusions have been reached:

1. The crash occurred on March 9, 1997 on Interstate 95 in Camden County, Georgia. In the area of the crash, Interstate 95 is a relatively flat four lane divided highway with a concrete road surface, asphalt improved shoulders, and grassy unimproved shoulders and median. According to police information, Mr. Daniel Van Etten was driving a 1993 Ford Explorer 4x2 northbound when "...the left rear tire tread apparently separated from (the) tire." The driver steered to the right "... attempting to move to the emergency lane." The driver then input an inappropriate amount of steering to the left, which placed the vehicle in a counterclockwise spin across the traveled portion of the roadway. The Explorer began to overturn due to the forces of the tires and rims sliding on the pavement. The vehicle then

rolled over towards the passengers side and the driver, Mr. Van Etten, was ejected from the vehicle and fatally injured.

2. The likely cause of the crash was that Mr. Van Etten failed to maintain control of his vehicle. The crash scene and the Ford Explorer were inspected for problems which could have caused or contributed to the crash. There were no such problems. Following the tread separation in the left rear tire, the driver apparently overreacted by steering abruptly rather than steering the vehicle in a controlled way. This caused the vehicle to slide across several lanes of travel and into the emergency lane.

3. The likely cause of the overturn is that lateral forces were exerted on the vehicle that overwhelmed its inherent stability. The sources of these forces are likely to be the vehicle's speed, the severity of the steering maneuvers undertaken by the driver, and the lean of the vehicle's body toward one side and then the other to augment vertical and lateral tire forces as the tires slid and the rims gouged into the roadway surface.

4. When the tread separates from a tire, the outer surface of rubber either partially or totally "peels off" of the inner rubber compounds or belts. A tire which is partially or totally missing its tread will have very different force and moment characteristics than the same tire with tread intact. Most importantly, the lateral or side force capability of the tire is reduced.

5. Although it is difficult to determine if a tire will or will not experience a tread separation at a given time, the process involved during a tread separation event on a moving vehicle does provide definite feedback to the driver and passengers in most circumstances. The feedback usually begins with a vibration in the vehicle similar to that created by a severely unbalanced tire. The vibration is followed by a "slapping" sound which is caused by the loose tread rubber contacting the pavement as the tire rotates. As the length of the loose tread grows, it begins to hit against vehicle body parts such as the inner fender well and outer sheet metal. The sound created by the tread hitting the vehicle body is very loud and resembles that of a beating drum. As the tread is separating, the rolling resistance of the tire increases which creates a force and moment on the vehicle. This moment acts to pull the vehicle slightly to the side of the separating tire.

6. Carr Engineering has conducted tests where a rear tire tread separation was induced on moving vehicles. These vehicles included a base model 1986 Ford Bronco II 4x4, a 1986 Ford Bronco II 4x4 XLT, a 1994 Dodge Intrepid, a 1987 Ford Club Wagon van, a 1994 Ford Bronco, a 1993 Ford Explorer 4x2, a 1990 Ford Aerostar van, and a 1987 Toyota van. The testing included multiple runs made at varying speeds, some in excess of 65 miles per hour. In every test run, the vibration and the "slapping" sound of the separated tread as it hit the ground and vehicle body were apparent prior to the tread ripping totally free from the tire carcass even though the test tire had been pre-cut to assure separation in a minimal amount of time. During the tread separation event, the tire did pull the vehicle slightly to one side but the driver kept a straight line path with a small steering correction. This amplitude of steer

angle is small and on the order required to keep a vehicle in the lane on curved highways or in a straight path during other events such as wind gusts or driving through water puddles at highway speeds.

7. As discussed above, a tire with a separated tread has reduced lateral force capacity when compared to the same tire with tread properly adhered to the tire carcass. To objectively measure this difference, Carr Engineering has conducted constant radius circle tests on a 1993 Ford Explorer 4x2 according to the Recommended Practice of the Society of Automotive Engineers. This Recommended Practice, XJ266, includes testing to measure the steering required to follow a circular path at ever increasing speeds until the limits of tire traction are exceeded. This test was performed with both good tires and with a rear tire that had a totally separated tread. In the tests with good tires, the vehicle could achieve a maximum lateral acceleration in excess of 0.7 g's lateral acceleration in both clockwise and counterclockwise directions. In the constant radius test with the missing tread tire, the vehicle could achieve just over 0.6 g's lateral acceleration in a turn with the separated tire on the inside or unloaded side of the vehicle. However, when the vehicle was driven in a turn with the separated tire on the outside or loaded side of the vehicle, the lateral acceleration capacity of the vehicle was reduced to less than 0.5 g's lateral acceleration. These tests confirm that a tread separation will not in and of itself, cause the Explorer to go out of control. Vehicle control can be maintained by slowing down and avoiding sharp maneuvers. The Explorer, like other vehicles, will have diminished capacity when such problems occur and it, like other vehicles, will go out of control if it is subjected to extreme demands after such problems have occurred. This behavior is common to all motor vehicle types and does not mean that the vehicle's design capacities are defective.

8. Carr Engineering has conducted tests where a rear tire was intentionally caused to "blow-out" on moving vehicles. These vehicles included a base model 1986 Ford Bronco II 4x4, a 1986 Ford Bronco II 4x4 XLT, a 1994 Dodge Intrepid, a 1987 Ford Club Wagon van, a 1994 Ford Bronco, a 1993 Ford Explorer 4x2, a 1990 Ford Aerostar van, and a 1987 Toyota van. The testing included multiple runs made at varying speeds, some in excess of 60 miles per hour. Following the "blow-out", the tire did pull the vehicle slightly to one side but the driver kept a straight line path with a small steering correction. These tests confirm that a "blow-out" will not in and of itself, cause the Explorer to go out of control. Vehicle control can be maintained by slowing down and avoiding sharp maneuvers. This behavior is common to all motor vehicle types and does not mean that the vehicle's design capacities are defective.

9. The dimensional characteristics of the 1993 Ford Explorer 4x2 are not the cause of this crash. Based on measurements that Carr Engineering, Inc. has made, the center of gravity height of these vehicles is approximately 26.6 inches above the ground, depending upon tire size and equipment. This value typically ranges from 18 to 24 inches for passenger automobiles and from 23 to 30 inches for utility and multipurpose vehicles. The center of gravity height for other vehicles used safely on the highways exceeds 80 inches for such vehicles as loaded semi-trailer trucks.

Also based on measurements made by Carr Engineering, Inc., the average track width for the Explorer is approximately 58.4 inches, although the value can be greater or lesser than this amount depending on wheel type and size. This width is similar to or greater than small passenger cars, trucks and other utility vehicles.

10. Simply dividing the track width by the center of gravity height to compute a "static stability ratio" is not a reliable technique to measure dynamic stability for any vehicle, including the 1993 Ford Explorer. Such computation will not predict the vehicle's behavior, nor will it allow valid comparisons to decide what is "safe" and "unsafe". However, even when such computations are made, the value that results for a Ford Explorer is within the range of values for other vehicles used safely on the highways.

11. The dimensional characteristics of the Ford Explorer allow it to perform in both "off-road" and "on-road" applications. For example, its length, wheel base, track width and ground clearance give it superior maneuverability and provide high "approach" and "departure" and "break over" angles so that it can negotiate narrow passageways and around and over obstacles "off-road." It incorporates relatively larger size tires that improve traction on unimproved surfaces. It is these characteristics that allow it to perform functions that common passenger cars cannot and which cause it in some circumstances to be different than some common passenger cars. Changing these dimensions in any significant way would diminish the vehicle's utility in its intended use.

12. The steering characteristics of the Ford Explorer are safe, stable and generally similar to those of other vehicles including passenger cars. In order to measure those characteristics objectively, Carr Engineering, Inc. has conducted testing according to the Recommended Practice of the Society of Automotive Engineers. This Recommended Practice, XJ266, includes testing to measure the steering required to follow a circular path at ever increasing speeds until the limits of tire traction are exceeded. In this test, Carr Engineering, Inc. found that the vehicle steering gain is appropriate and its "understeer" characteristic is similar to the value drivers have come to expect in passenger cars, trucks, and multipurpose vehicles sold in the United States. The vehicle has the capacity to follow a circular path at lateral accelerations exceeding 0.65 G's. This capacity is very high and will allow the vehicle to respond to expected driver inputs with a factor of safety beyond that required to maneuver in a highway environment in both normal and reasonable crash avoidance situations.

13. The handling and stability characteristics of the Ford Explorer when maneuvered in turns are reasonably safe. Those characteristics are extremely good when compared to other vehicles of its type and provide capacities significantly in excess of the demands of normal driving and reasonable crash avoidance situations. Carr Engineering, Inc. has conducted tests to determine this capacity. These tests include slalom tests in which the vehicle is steered violently side-to-side through a serpentine course at speeds from 50 to in excess of 70 miles per hour. Even at the limits of tire traction, the vehicle remained safe and stable in these

maneuvers. Carr Engineering, Inc. has also conducted a severe lane-change test according to the procedure of the International Standards Organization (ISO). In this test, the vehicle is steered from one narrow lane to the left into a second narrow lane and then back to the right to a third narrow lane. The ISO Procedure envisions that any vehicle that can complete that maneuver at entry speeds of 48 miles per hour or more is reasonably safe and stable for normal highway use. Carr Engineering, Inc. found that the Ford Explorer would complete the maneuver at speeds in excess of that value without a problem. Carr Engineering, Inc. also conducted tests to determine the vehicle's stability at lateral accelerations in excess of 0.70 G's at speeds in excess of 70 miles per hour. Even though the tires are near their limit of traction under these conditions, the Ford Explorer remains safe and stable. Carr Engineering, Inc. has also caused the Ford Explorer to spin around on flat, level pavement through a full 180-degree turn to face back in its original line of travel (i.e. bootlegger turn). It accomplishes that maneuver without problem even though the maneuver by itself reflects a vehicle that has been caused to go completely out of control.

14. Carr Engineering, Inc. has evaluated the stability of the Ford Explorer in various braking maneuvers, including panic braking from speeds in excess of 60 miles per hour and panic braking while the vehicle is in a turn at the limit of its tires' traction. In these tests, the vehicle's braking system behaved predictably allowing the vehicle to be brought to a stop without loss of stability.

15. The Ford Explorer is equipped with a "twin I-beam" front suspension system. This is the same type of suspension used by Ford in its light trucks since the 1960s and is an appropriate suspension for the Ford Explorer . It is my understanding that plaintiffs have retained engineers who are critical of the twin I-beam suspension claiming that it "jacks." The term "jacking" has been applied in the past to the effect whereby a suspension's geometry transmits tire forces to a vehicle's body to actually lift it. Such a thing does occur to a small degree with any independent suspension and can occur to a substantial degree if and only if its geometry is chosen improperly. The geometry chose for the Ford Explorer is proper because it employs an arm of relatively long length that is mounted to the body close to the ground compared to that length. This eliminates the occurrence of significant "jacking" as described by plaintiff's experts. Carr Engineering, Inc. has confirmed this through testing of a 1991 Ford Explorer 4x4 with a twin I-beam front suspension and a 1996 Ford Explorer 4x4 with a short-long arm front suspension. This testing included standard accepted quasi-steady state and highly transient maneuvers at various speeds and up to the limit of the tire's traction. In these tests, the vertical movement of the center of gravity was measured and when compared show little difference between the performance of the 1991 Explorer and the 1996 Explorer. Carr Engineering, Inc. has also performed similar tests on 1986 Ford Bronco II 4x4, a 1990 Ford Bronco II 4x2, and a 1985 Buick LeSabre sedan.

16. All vehicles, including passenger cars and pickup trucks, will overturn when subjected to extraordinary conditions. Among such conditions is sudden and inappropriate steering on paved or unpaved surfaces. For example, Carr Engineering, Inc. has demonstrated this in

tests conducted in November of 1984 in which a passenger car, a 4-wheel drive utility vehicle, and a pick-up truck were overturned due to steering inputs alone on a flat paved surface at speeds below 40 miles per hour. Others have found the same result in many tests. For example, the University of Michigan caused a Mercedes 4-door sedan and a Dodge Coronet sedan to overturn under similar conditions in a 1972 test that it conducted under a United States government contract. Overturn of vehicles, including all passenger cars, can and do occur under these and other conditions and that simple occurrence is not evidence of a defective design.

17. Carr Engineering, Inc. has investigated a variety of crashes in which a variety of circumstances caused the loss of control and overturn of a variety of vehicles. For example, Carr Engineering, Inc. investigated an overturn crash of a Ford Escort. Its driver failed to steer so that when the roadway curved to the left his Escort went straight to depart the paved road surface. The driver abruptly turned the steering to the left to regain the road causing the Escort to slide and overturn in the roadway. As another example, Carr Engineering, Inc. investigated a crash involving a Jeep Cherokee whose driver failed to steer to follow a right hand curve in the roadway and instead allowed his Cherokee to depart from the left hand side of the roadway. He responded to that situation by jerking the steering to the right to regain the road and then to the left while on the road. These maneuvers resulted in the Cherokee's overturn on-road. A final example involves a crash involving a Chevrolet S-10 Blazer whose driver allowed the vehicle to leave the traveled portion of an interstate highway and then steered abruptly to regain the road. His steering resulted in the S-10 Blazer's overturn on-road. Other investigators, such as those employed by the United States Department of Transportation's National Accident Sampling System, have recorded on-road overturn crashes involving passenger cars, light trucks, vans, and utility vehicles. The Department of Transportation has estimated that approximately 225,000 rollover crashes take place in the United States annually. Two thirds of those involve common passenger cars and approximately 10,000 passenger cars overturn on-road annually.

18. The National Highway Traffic Safety Administration (NHTSA) of the United States Department of Transportation has specifically responded to citizen petitions and other claims that various small utility vehicles are "defective" because of their handling, stability, and crashworthiness characteristics. Such investigations included vehicle models such as the Jeep CJ, the Suzuki Samurai, the Ford Bronco II, and the Isuzu Trooper. Each of those investigations have resulted in the Agency concluding that those specific vehicles and small utility vehicles as a class do not possess characteristics consistent with them being declared "defective" or any of those characteristics named above. In addition, NHTSA has studied rollover crashes since the early 1970s and has determined that it is inappropriate to promulgate any test or standard for rollover resistance. NHTSA has considered specific regulatory proposals for rollover resistance including a static stability factor (T/2H), a tilt table ratio, and a side pull ratio, and has determined not to adopt such proposals. NHTSA has concluded that different classes of vehicles have different uses and different functional characteristics, including rollover resistance. NHTSA has concluded that the fact that certain

classes of vehicles have lower rollover resistance than full-size passenger cars does not render these vehicles defective or unsafe.

19. The tests used by Ford Motor Company to design and develop the Explorer are appropriate for this purpose and are consistent with industry practice. Successful completion of these tests would demonstrate that a vehicle had reasonably safe steering, handling, and stability characteristics. The nature of the tests is such that they would reveal "defective" conditions of handling and stability if such conditions existed. Ford also employs sophisticated computer simulation software called ADAMS as an added evaluation of vehicle safety. I have first hand knowledge of Ford's vehicle test procedures and it's use of the ADAMS software.

In summary, the design and manufacture of the 1993 Ford Explorer 4x2 is reasonably safe. The cause of this crash was that the driver apparently overreacted to the tread separation by steering abruptly rather than steering the vehicle in a controlled way. The Explorer's design and construction are reasonably safe, are appropriate for a vehicle of its type, and did not cause this crash.

I have worked as an automotive engineer for more than 12 years and have formal training as an engineer. A resume which summaries that experience is attached and it describes the background, experience, and training from which I may draw conclusions and opinions. Also attached is a list of my previous testimony. Carr Engineering, Inc. charges $285 per hour for my services in this matter.

Sincerely,

Donald F. Tandy, Jr.

CARR ENGINEERING, INC.
12500 CASTLEBRIDGE DRIVE HOUSTON, TEXAS 77065-4532
TELEPHONE: 281/894-8955
FAX: 281/894-5455

DONALD F. TANDY, JR.

Specialized Professional Competence

- Failure analysis and accident reconstruction.
- Risk analysis of mechanical designs including identification of failure modes, assessment of consequences of failure, quantification of actual risk for use of existing systems, and projections of risks for systems under consideration.
- Design, computer aided engineering, computer modeling of design, manufacturing, design verification, reliability and quality control techniques for mass produced products.
- Design and evaluation of automotive suspension and crash protection systems and crashworthiness analysis of motor vehicles.

Professional Qualifications

- Bachelor of Science (Mechanical Engineering), The Ohio State University, 1985
- Master of Science (Mechanical Engineering), The Ohio State University, 1986
- Senior Engineer,
  Carr Engineering, Inc. - 1995 to present
- Supervisor, Advanced Vehicle Technology,
  Ford Motor Company - 1994-1995
  (Core and Advanced Vehicle Dynamics CAE and Test)
- Supervisor, Light Truck Engineering,
  Ford Motor Company - 1993-1995
  (Light Truck Vehicle Dynamics and Suspension Design and Test)
- Technical Specialist, Light Truck Engineering,
  Ford Motor Company - 1989-1993
  (Vehicle Dynamic Modeling and Test)
- Research Engineer, Product Manufacturing and Engineering Staff,
  Ford Motor Company - 1986-1989
  (Design and Testing of Advanced Suspension Concepts)
- Recipient of One Ford Motor Company Henry Ford Technical Award, Six Ford Customer Driven Quality Awards, and Two Ford Light Truck Achievement Awards
- Holder of Two Pending United States Government Patents on Suspension Designs.
- Member of Society of Automotive Engineers and American Society of Mechanical Engineers.

DEPOSITION TESTIMONY OF DONALD F. TANDY, JR.

Woodard (Howard) v. Ford Columbia, TN	1-94-0121	01/19/95
Jones (Gerald) v. Toyota Fulton Co., GA	94VS89350F	03/27/96
Yawer (Jwan) v. Toyota Northern Dist of Ohio, Eastern Div.	5:94 CV 1921	04/02/96
Bedford (Clara) v. Ford Harris Co., TX	255,149	05/07/96
Wade (Charles) v. Toyota Los Angeles, Co., CA	PC011452 W	06/04/96
Brockie (Chad) v. Ford Jefferson Circuit, MI	95-Ci-06126	09/05/96, 05/05/97 & 07/28/97
Wade (Charles) v. Toyota Los Angeles, Co., CA	PC011452 W	09/13/96
Glover (Neeley) v. Ford Waco, TX	W96CA207	11/11/96
Kyle (Toni) v. Ford Harris Co., TX	95-38284	11/14/96
Hurst (Terry) v. Ford New Mexico	CIV 96 0126 JP	12/16/96
Nemirovsky (Marianna) v. Honda Los Angeles Co., CA	PC015685Y & PC015686Y	02/12/97
Moodenbaugh (Michael) v. Ford Tacoma, WA	C95-5493FDB	02/26/97

Martens-Sagiao (Melinda) v. Toyota Eastern Dist, WA	CS-95-0511-WFN	02/28/97
Greenwald (Michael) v. Ford Maricopa Co., AZ	CV 95-03064	04/01/97
Straus v. Toyota Los Angeles, CA	SC039174	04/04/97
Jackson (Leonard) v. General Motors Mobile Co., AL	CV-95-3098	04/10/97
Curcio (Marita) v. Toyota Dauphin Co., PA	3346-S-1992	05/01&28/97
Ambrosio (Alexis) v. Ford Essex Co., NJ	ESX-L-173-94	05/15/97
Teekel (Alfred) v. General Motors Baton Rouge, LA	338,543, DIVISION "M"	06/24/97
Solis (Julian) v. Ford Hidalgo Co., TX	C-4177-95-E	07/07/97
Hightower (Kimberly) v. Ford Harris Co., TX	94-021244	07/14/97
Berger (Richard) & Samuel (Michael) v. Ford Northern Div., MD	WMN-96-2155	09/03,24/97
Chavers (Lisa) v. Nissan Pensacola, FL	95-30169-LAC	09/11/97
Sunderland (Denis) v. Ford San Diego, CA	N72125	10/03/97
King (Anthony) v. Toyota Missoula Co., MT	81858	10/28/97
Tooke (Travis) (For Squirrels) v. Ford Savannah, GA	CV496-87, CV496-88, CV496-115, CV496-116, CV496-269	11/07/97

Alvarez (Elizabeth) v. Ford Kern Co., CA	229121	01/08/98
Brown (Janet & Warren) v. Ford Los Angeles Co., CA	GC 016559	03/02/98
Harris (Billy Wayne) v. Ford Jackson, MS	3:97cvl 7BN	03/05/98
Moses (Jennifer) v. Ford Contra Costa Co., CA	C-96-01651	03/09,10/98, 6/9/98
Schoenbeck (Mark) v. Toyota Great Falls, MT	CV 96-094-GF-DWM, CV 97-067-GF-DWM, CV 97-066-GF-DWM	03/30/98
Greco (Paul) v. Ford New Albany Div., IN	NA 94-165-C R/H	04/02/98
Janicki (Paul) v. Ford Orange Co., CA	769496	04/22/98
Wootton (Allison) v. Ford Louisville, KY	3:95 CV 797-C	04/24/98
Luciow (Juan) v. Isuzu Miami, FL	97-1428-KING	05/18/98
Cartrette (Judith O'Quinn) v. Isuzu Wake Co., NC	95 CVS 11667	05/20/98
Silva (Cynthia) v. Ford Galveston, TX	G-98-031	08/03/98
Moses (Jennifer) v. Ford Contra Costa Co., CA	C-96-01651	09/01/98, 09/18/98
Lovett (Willa Jari) v. Chrysler Ft. Smith, AR	97-2036	09/14/98
Gutierrez (Irene) v. Isuzu Ventura, CA	CIV 171967	09/21/98

Hufnagel (Jane) v. Ford Jefferson Co., KY	92-CI-06693	09/23/98
McDonald (William) v. Ford Alexandria, VA	CL97-0757	10/01/98
Morris (Nancy) v. Ford Monongalia Co., WV	96-C-332	10/05/98
Howard (Anthony) & Carleton (Kevin) v. Ford Maricopa Co., AZ	CV 97-02797	12/04/98
Howard (Thomas B.) v. Isuzu Dist. of MA	96-11565 DPW	12/08/98
Palmer (Laura) v. New Roads Motor Company, Inc. Pointe Coupee Parish, LA	31,718	12/21/98
White (Barrett R.) v. Isuzu Tallapoosa Co., AL	CV-97-45	12/29/98
Beefamerica Operating Co. (Douglas, David) v. Ford Hillsborough Co., FL	96-4533 Division "D"	01/04,05/99
Williams (Deborah) v. General Motors Northern Dist., IL	93 C 6661	01/07,08/99

TRIAL TESTIMONY

OF

DONALD F. TANDY, JR.

Woodard (Howard) v. Ford Columbia, TN	1-94-0121	06/22/95
Smith (Jackie) v. Isuzu Houston, TX	H-95-3815	12/04/96
Moodenbaugh (Michael) v. Ford Tacoma, WA	C95-5493FDB	03/12/97
Greenwald (Michael) v. Ford Maricopa Co., AZ	CV 95-03064	05/07,08/97
Cartrette (Judith O'Quinn) v. Isuzu Wake Co., NC	95 CVS 11667	75/24,27/98
Lovett (Willa Jari) v. Chrysler Ft. Smith, AR	97-2036	10/23/98
King (Anthony) v. Toyota Missoula Co., MT	81858	10/26/98
Moses (Jennifer) v. Ford Contra Costa Co., CA	C-96-01651	11/09,10/98

Mr. TAUZIN. The chairman is pleased to recognize the chairman of the full Commerce Committee, the gentleman from Richmond, Virginia, Mr. Bliley.

Chairman BLILEY. Thank you, Mr. Chairman. And thank you for holding this second day of hearings on the recent Firestone tire recall which is of grave importance to the safety of the American driving public. I know most Americans still have many unanswered questions about this human tragedy. But ones that I hope we can focus on today are, one, how could this have happened? Where were the Federal safety regulators who set testing requirements for these tires before they were allowed on the market? Where were the company tire experts who are responsible for ensuring the quality of the tires before they are sold to consumers? And how can we be sure that other tires on the market today are any safer than the now recalled tires?

It appears that every one agrees that Federal testing requirements for tires first issued in 1968 are outdated and need to be more vigorous. The Federal Government currently requires that new tires sustain speeds of only 85 miles per hour for half an hour to be certified. While it is true that companies like Firestone go beyond these minimum requirements in certifying their tires, it appears that the differences are one of degree and not of kind. It is clear both to me as a layman, and to some actual tire experts, that these tests need to be not only more demanding on the tire, but that we need to develop ways to test for how a tire in the real world, after 20- or 30,000 miles on it, will perform under stressful conditions. It is this scenario that accounts for most of the fatal accidents we are seeing today on these tires. And it is little wonder that the current tests fail to catch this terrible problem. I believe that the tests performed on these tires by both Firestone and Ford, even if up to industry or government standards, were inadequate to do the job we should expects these tests to do; that is, tell us whether we can be confident that our tires won't start to come apart as we are driving down the highway after only 2 or 3 years of use.

The high speed tests conducted before the Explorer went on the road with these Firestone tires, with the exception of a single test in 1989 conducted by Ford, were not conducted at Ford's recommended tire pressure level, a key component in tire level performance. Nor were any of these high speeds tests performed on the Explorer itself.

We need to do better than that to protect American families. We also need to address the question of vehicle tire margin of safety. We build cars that can go in excess of 100 miles per hour, yet put tires on them that are generally speed-rated to only 112 miles per hour. What consumers do not know is that such a speed rating may mean that the tire may last only 10 minutes at that speed before literally coming apart. What does that tell us about tire performance when sustained at high, if admittedly unlawful, speeds? I hope this tragedy can force all of us in government and industry to rethink how we test tires before we put them on the road.

Thank you, Mr. Chairman.

Mr. TAUZIN. The Chair thanks the chairman and wants to associate himself with the opening statement of the Chair. The Chair is focused indeed on a serious question that is not just testing—testing of tires at age and wear normally under normal use.

The Chair recognizes the gentleman from Michigan, the ranking minority member of the full committee, Mr. Dingell, for an opening statement.

Mr. DINGELL. Mr. Chairman, I want first of all to express my appreciation to you for holding the hearings. Second of all, I am firmly determined to cooperate with you. I have a splendid statement here this morning, from which I will excerpt. I would advise all, however, who wish enlightenment on the matter, to follow the full statement because it will give them the flavor that they will not get from the excerpt.

Mr. Chairman, measured against NHTSA's own standard for taking action earlier this year, agency records demonstrate that NHTSA should have acted more than 2 years ago. On March 6 of this year, NHTSA announced that it was beginning an initial evaluation of Firestone tire failures because the agency had received 25 complaints reporting tread separation and blowouts. These 25 complaints did not include complaints that we have heard so much about NHTSA receiving from State Farm in July 1998. The fact is, however, that prior to July 1998, NHTSA's records show that the agency had already received 26 complaints about recalled Firestone tires, one more than the 25 complaints that NHTSA cited as the basis for its own action on March 6, 2000. So if you add in the complaints received from State Farm, NHTSA had as of July 1988—1998—at least 47 complaints about the recalled Firestone tires, or almost twice as many complaints as the agency said it had received and that justified its initial evaluation of the matter.

But there's more. If 25 complaints were good enough for NHTSA to act on March 6 of this year, why weren't the 26 complaints NHTSA had received prior to July 1998 enough to justify action then? This is not a hypothetical question that I ask, and I would demand that the agency account fully for its action and also for its inaction. Information I received from NHTSA indicates that the agency did not, as it has claimed, lack sufficient information to act. NHTSA in fact had the information.

This committee has a special responsibility to determine why NHTSA failed to act and to make sure that these kind of events do not happen again. So far, 103 people are believed to have lost their lives in accidents involving the recalled Firestone tires. One can only assume that by the delaying of the action for 2 years, as NHTSA appears to have done, lives were lost that otherwise might have been saved.

The American public does deserve better from its government and from government agencies charged with ensuring tire safety. Mr. Chairman, I look forward to the testimony of the witnesses.

Mr. TAUZIN. Mr. Dingell, I would only add, sir, that the numbers you cited that were available to NHTSA years ago all should be augmented by the numbers of fatal accident reports that came from the FARS system that was also available to NHTSA, as illustrated in this chart that indicates that through 1999 NHTSA knew, because of these four reports, that 56 fatal accidents had occurred, with 72 fatalities. That is added to the numbers that Mr. Dingell has recited.

Mr. DINGELL. Those numbers are interesting. If you look at 1998, the numbers of accidents began to climb very sharply.

Mr. TAUZIN. The Chair thanks the gentleman for the opening statement.

The Chair is pleased to recognize the chairman of the Oversight and Investigations Committee of our Commerce Committee, the gentleman from Michigan, Mr. Upton. And in doing so, let me again advise everyone of the extraordinary work that Mr. Upton and the investigators of that subcommittee have done to augment the work of these hearings. I personally thank you and your staff for the extraordinary job done, particularly in giving us the information that they have derived from this extraordinary volume of documents that has been produced.

Mr. Upton of Michigan.

Mr. UPTON. Thank you very much, my friend, Mr. Tauzin. I too want to thank our staffs, both personal staff as well as the professional staff on the subcommittee, for really getting an inordinate amount of work done in a very expeditious way so that we could have these hearings not only 2 weeks ago but are actually prepared to go to markup this afternoon.

We have learned a lot since our last hearing about so-called quality control tests conducted by Firestone in 1996 on a random sample of 229 tires from the Decatur plant which resulted in a number of tread separations. In fact, we think there might have been as high as a 5 percent failure rate from those tests. This is only the tip of the iceberg in terms of what Firestone knew for years about the dangerous defects in its tires. Yet, astoundingly, it was not until years later that this information was pried from Firestone's grip, which brought this all to a recall of 6.5 million tires and, sadly, at least 103 deaths.

Let's think about that scene for a second. Let's think about those tires being produced at facilities around the country, particularly the Decatur facility. Tires taken off the assembly line, tested, failing; and the word doesn't go up the chain of command to the showroom. Families go to those showrooms and they look at the wonderful new cars, spanking new tires, purchase that vehicle, and take their families on trips, whether they be to work, to church, to soccer or baseball games, you name it. And somehow, tragically, we see a whole host of accidents around the country, particularly in the South, with a good number of deaths.

Somebody knew. Somebody knew that those tires were failing when they were produced, and yet the word did not go down the line. I am not an engineer, I am not a lawyer. And I don't believe that we will today find out precisely what was causing those defects. We may never learn the answers, in fact. But I will tell you one thinM: There was something rotten in Decatur.

In today's hearing, we will be asking some tough questions to find out where we are today. My aim is not to stick a sword in anyone's eye for its own sake, but, rather, turn those swords from our hearing into plowshares. We must do this in order to sow the seeds of reform in our motor vehicle safety laws and help ensure that American families are as safe as possible when they travel on our Nation's roads.

That is why I introduced bipartisan legislation last week which has been co-sponsored by so many Republican and Democrats on this panel. Our bill attempts to fix the potholes in our Nation's motor vehicle safety laws which have become so evident as a result of this investigation, and to ensure that this type of bad behavior is prevented in the future, preventing the innocent loss of life.

This is commonsense legislation that still can be enacted before the legislative clock expires on the 106th Congress. I commend Congressman Tauzin for moving forward expeditiously to mark up this act later today. And with a few legislative days left, we do have to move with deliberate speed. Thank you, Mr. Chairman.

Mr. TAUZIN. Thank you Mr. Upton.

The Chair will recognize the designated ranking minority member of the O&I Subcommittee, the gentleman from Michigan, Mr. Stupak, for an opening statement.

Mr. STUPAK. Thank you, Mr. Chairman. Today we are holding another hearing on this very important auto safety issue. This hearing is not as easy as the one we held 2 weeks ago when we were exposing a serious safety problem. The question everyone wants answered now is: Why did it happen?

But it is not a question that we can answer today. Ford and Firestone's investigations are not completed, and the committee at this point is not in a position to take the historical raw data that we have seen and make definitive statements or judgments about what that data means.

So a word of caution for us all today, Mr. Chairman. I have reviewed since the last hearing several erroneous press reports, because some reporters thought they could take the data delivered to this committee and draw conclusions about who knows what and when they knew it.

Let me refer to one such article in the Washington Post on September 12. The Post said that in 1990, Firestone conducted 26 test runs on the recalled tires and that 25 experienced tread separations. A little investigative work would have revealed that these were not production tires but experimental tires on which separations, some of which were not the type that we are looking at here, but the separations were being induced by a variety of tests.

Then we heard about the four 1996 tires that failed at a high speed because the shoulder separated. Firestone witnesses will tell us today that the test was run because of a perceived problem but not the problem we are focusing on here today, and that a change was made in the quality control process to eliminate it, without any actual negative impact.

The result has been a continuation of finger-pointing that doesn't get us any closer to the truth but makes great headlines. This morning there was a headline about some additional test line data, but no one has yet asked the company what does it mean.

I am not here to defend Ford or Firestone; in fact, probably just the opposite. But I have spent most of my life doing criminal investigations and other things and before you make statements or reach conclusions or judgments, we had to have the facts. And I hope the purpose of these hearings is to get to those facts.

In fact, some people thought my questions last week were too harsh. I will continue to ask tough questions, but they will be accurate questions based upon information we know. What we really need to be discussing today is whether the tests that the Department of Transportation and the auto and tire manufacturers run on tires—are they sufficient? Is the entire vehicle package sufficient to protect consumers driving on today's highways, with today's speeds, with a 1-, 2-, or 3-year-old.

We should be discussing whether the Office of Defect Investigations at NHTSA, the National Highway Traffic Safety Administration, has the budget to develop, monitor, and enforce the standards we want, or what exactly are those standards. We should be discussing whether NHTSA should be a more timely independent investigator of vehicle tragedies, like the National Transportation Safety Board does with airline crashes, as opposed to having to rely on manufacturers for their investigations.

At our last hearing I received a commitment from Ford and Firestone that they would jointly set up a completely independent panel, separate from what they are doing, to determine what went wrong. I recently spoke to Ford and they are moving in that direction, and I look forward to that panel being set up to get to the facts and not necessarily the headlines.

So with that, Mr. Chairman, with that caution, I look forward to receiving the information today. I look forward to asking questions, and I hope we can move forward based on the data and the questions presented therefrom.

Mr. TAUZIN. The Chair thanks the gentleman, and we would like to point out for the record that the Post report of the 1990 testing that was in fact erroneous, that information did not come from this committee; it came from information derived elsewhere. And I would agree with the gentleman; erroneous reporting and erroneous numbers have not helped. All of us understand that is why we have the hearing this morning. We want the facts and we want to make judgment on the facts. I thank the gentleman for pointing that out.

The Chair would ask unanimous consent that all members' written statements be made part of the record and, without objection, it is so ordered. And the Chair will now ask the members if anyone has the need to make an opening statement and wishes to make a few brief remarks, if I can have your concurrence in keeping them brief. I understand; I will give you all a chance, but keep them brief because we will run short of time to get to the markup this afternoon.

The vice chairman of the subcommittee, Mr. Oxley, is here and I want to give him a chance. Mr. Oxley, do you have an opening statement?

Mr. OXLEY. Thank you, Mr. Chairman. Since the committees' first hearing on the Firestone tire recall 3 weeks ago, barely a day has gone by without some sort of story in the news media. It is my hope that at least every consumer who may need new tires has now been alerted. Given the daily publicity, I think it also bears repeating that on the whole, the quality level of the vehicles and tires that people depend on each day has never been higher.

Those of us on the committee have a dual responsibility. We must see that the immediate steps are taken to protect the public safety. And I think everyone—manufacturers, NHTSA, and this committee—is working together on this. I continue to follow the progress on the recall and urge all parties to do everything in their power to provide every consumer with safe tires as soon as possible.

As lawmakers we also have a duty to respond to the situation with measured responsible public policy that will stand the test of time. That is the challenge for us right now, because despite intensive investigation and endless conjecture, we still cannot definitely pinpoint exactly why and where things went wrong.

As for the hearing this morning, one key question we'll explore is what kind of testing was done on the tires involved in these accidents. I appreciate the information that has been submitted to the committee on short notice and look forward to hearing from the experts in the field.

As we know, Federal tire standards have not changed since the 1960's, although industry practice certainly has. That is one reason why tires last twice as long as they used to. I think as we listen to time lines, it will be important to remember that we are dealing with industries that are constantly changing to account for such unexpected variables as higher speed limits and the uses consumers put vehicles to. Any wrongdoing should be exposed, but we again must appreciate the complexities of this situation.

I would cite to the members a recent column in the Wall Street Journal dated September 13, 2000, Business World, by Homer Jenkins, which talks about—it is titled, "Yo, America: Get Faster Tires." And he points out that there has been a huge increase in speed limits, particularly in a couple of major States, that in many ways may have contributed to the situation.

These hearings are important because we need accurate information in order to make informed legislative decisions. There are things that ought to be addressed immediately and there are other things that may need more thought and discussion. I will go into more detail on this when the subcommittee moves to markup.

My experience is that Congress has rarely made good laws when it was a purely reactive situation. Now that I am in the majority, I feel a special responsibility to make sure that our response to an urgent issue of public safety is sound and results in good legislation for consumers and the companies they deal with; that we will be able to look back in 5 or 10 years with pride rather than regret. When legislation is passed in haste—Superfund comes to mind—many unintended consequences can occur. Let's make certain we do the right thing the first time. I yield back.

Mr. TAUZIN. Thank you.

The Chair recognizes the gentleman from Ohio, Mr. Sawyer.

Mr. SAWYER. Thank you Mr. Chairman. I respect your desire to keep things short, so will only point out two matters that really weren't clear in our first hearings.

The first is that while it remains a 30-year-old standard, NHTSA and the tire industry have been working for the last 3 years to elevate those standards to bring them to the modern era to reflect the enormous changes that have taken place in the tire design and manufacturing process in the last 3 decades. It is an important undertaking.

Also, as the gentleman from Ohio suggests, it is complex. It is complex because a tire is complex. It is a combination of some 200 raw materials, components including natural and synthetic rubbers, metals, fabric, oils, pigments and other chemicals. Their applications are in a wide range of diverse settings. Testing perhaps ought to reflect that diversity. We have to exercise great care in putting revisions together.

Another message that was not delivered last week was that with regard to the changes in section 109, was that the industry itself that petitioned for those changes. So as we talk about testing today and talk about revisions to the law, I hope we will remember that there is a broader range of people we need to hear from. We need to hear, Mr. Chairman, more broadly from the automotive industry and from the tire industry and perhaps even from tire testing specialists across this country who have the expertise to understand the kind of changes in testing that need to take place if we are going to get to the kinds of answers that you've asked for today. I thank you very much.

Mr. TAUZIN. I thank the gentleman. I will remind him that we are not finished. This will extend into next year. We intend further hearings, particularly consumer education hearings, on some of these safety issues. And I thank the gentleman for that comment.

The Chair recognizes the gentleman from California, Mr. Cox.

Mr. COX. Thank you. I want to congratulate the chairman for holding these hearings, but I believe we will get to the facts more quickly if we have fewer speeches from members and more testimony. Thank you.

Mr. TAUZIN. I thank the gentleman. Anyone else wishing to make an opening statement? Anyone here? Mr. Stearns is recognized from Florida.

Mr. STEARNS. Thank you Mr. Chairman. As I stated earlier, my concern is that I am receiving letters from my constituents in Florida where a large number of these fatalities occurred. And I received one recently from a father who lost his son and his future daughter-in-law when his Ford Explorer crashed as a result of the tire tread separation. He demanded accountability.

But I think, my colleagues, the reform we are talking about is necessary, and we need to educate ourselves because the crashes perhaps are not attributed to one single factor. And so I urge the chairman to use caution and deliberation here as we move forward.

I notice that he has a markup scheduled for today. A lot of us are still trying to read through this legislation and perhaps—do we have the question—the question I pose: Do we have enough information that we can pass legislation with a markup today, with a certain amount of certitude that what we are doing is accurate and not creating more litigation? For example, there is more tire information that is coming out about the uniform tire quality grading system, and within this grading system there is a category for tires' heat rating. Tires are graded by the manufacturer based upon the ability to resist and dissipate heat. And there are three grades: A, B, and C, with A being the most heat resistant, and C being the minimum standard for heat resistance. I would like to note, Mr. Chairman, that Firestone ATX and the Wilderness AT tires both use tires that are rated C. And I understand that this grade is given under normal operating conditions where the tire is properly inflated, not loaded down, and running at normal speed; which is contrary to what happens with a typical family that drives down a highway at 70 miles an hour for most of the day. It's hot summer day, perhaps about 90 degrees, they have a Ford Explorer fully packed with all the equipment, and they're riding with these minimum heat resistant tires which are underinflated, carrying extra weight, and obviously at that high temperature something is going to happen.

So I know that Ford has also used Goodyear tires on the Explorer that used a better heat rating. So I think it is possible, Mr. Chairman, that we might caution ourselves about marking up so quickly this legislation until we have had a better understanding and a chance to percolate some of this information and to see what are more of the problems here, because in the end, we have both a legislative responsibility but we also have a moral responsibility to come to the bottom of this. And I appreciate, Mr. Chairman, your hearing.

Mr. TAUZIN. Would the gentleman yield?

Mr. STEARNS. I would be glad to.

Mr. TAUZIN. I would simply point out that the chairman of the full committee, Mr. Bliley, and myself, we have heard those concerns, Mr. Stearns. We appreciate them coming, about us being very deliberate in the way we mark up this legislation. I want to make clear we plan to mark up the bill, to take up the bill, get opening statements on the bill out of the way, take several noncontroversial amendments to the bill, and then to recess for about a week. We will probably come back on Wednesday of next week, so that you and all of our members will have as much time as we can afford to literally be better prepared for this very serious and important task of producing reform legislation.

So we are going to balance the need to move as quickly as we can in order to meet the adjournment deadlines for this Congress with the concerns, the very real concerns the gentleman has expressed. Thank you for bringing these concerns to our attention.

The Chair would recognize the gentleman from Texas, Mr. Green.

Mr. GREEN. Thank you, Mr. Chairman. I agree with my colleague, Mr. Cox, that we would learn more by listening instead of talking, but I want to thank you and your staff and the committee for their rapid response that we are doing to the problem that we see. And I'll just paraphrase and ask unanimous consent for my full statement to be in the record.

Since our last hearing, when Firestone testified that potential defects weren't known until 1998 and now we have documentation that shows the problems were found as early as 1996. Hopefully, the witnesses will answer that. Also, I would like to continue to hear from NHTSA about the information they may have had and why they failed to act sooner to protect the driving public, and how can we change this with your legislation. And, Mr. Chairman, I would also like to see hopefully the witnesses address—and I am interested in hearing about reports that these tires, Firestone tires on Explorers, were not even tested on Explorers, and my concern is that they were part of the standard equipment, an integral part of the vehicle that should be tested. I yield back my time.

Mr. TAUZIN. Thank you Mr. Chairman.

The gentleman, Mr. Bryant, is recognized.

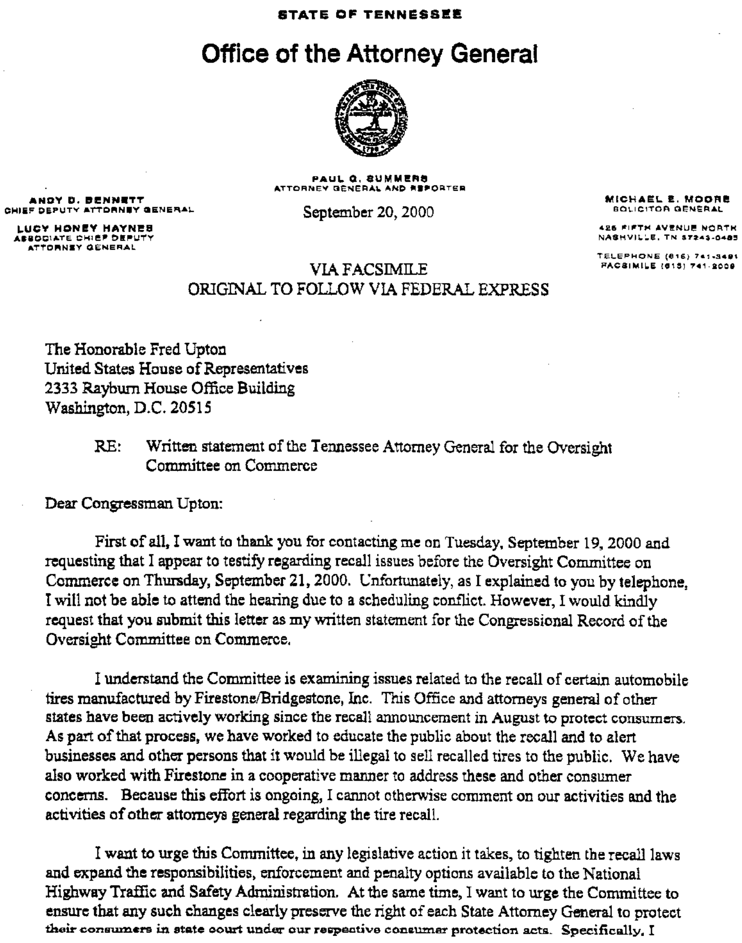
Mr. BRYANT. Thank you, Mr. Chairman. I too will be brief and file my more complete statement as part of the record.

Two quick points. I've been deeply disturbed to learn that some of the recalled tires are actually finding their way back on to the highways. In Tennessee, our Attorney General's Office is investigating reports that some used tire dealers may be selling the recalled tires which would then be traded in for new tires under the Firestone recall program. Aside from being unethical and illegal, this actually places more of these tires on the road, which is obviously a threat to public safety.

In response to this problem, I would like to know what steps are being taken to get these recalled tires out of circulation and I would also like ask unanimous consent to include our Tennessee Attorney General's statement regarding the resale of recalled products into the record, as well as just a brief portion of that I would like to read, from our attorney general, in terms of what we have might do legislatively.

Mr. TAUZIN. Let me first ask if there is any objection to the gentleman's unanimous consent request? Hearing none, the gentleman's consent request is granted.

[The statement follows:]



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September 20, 2000

VIA FACSIMILE
ORIGINAL TO FOLLOW VIA FEDERAL EXPRESS

The Honorable Fred Upton
United States House of Representatives
2333 Rayburn House Office Building
Washington, D.C. 20515

RE: Written statement of the Tennessee Attorney General for the Oversight Committee on Commerce

Dear Congressman Upton:

First of all, I want to thank you for contacting me on Tuesday, September 19, 2000 and requesting that I appear to testify regarding recall issues before the Oversight Committee on Commerce on Thursday, September 21, 2000. Unfortunately, as I explained to you by telephone, I will not be able to attend the hearing due to a scheduling conflict. However, I would kindly request that you submit this letter as my written statement for the Congressional Record of the Oversight Committee on Commerce.

I understand the Committee is examining issues related to the recall of certain automobile tires manufactured by Firestone/Bridgestone, Inc. This Office and attorneys general of other states have been actively working since the recall announcement in August to protect consumers. As part of that process, we have worked to educate the public about the recall and to alert businesses and other persons that it would be illegal to sell recalled tires to the public. We have also worked with Firestone in a cooperative manner to address these and other consumer concerns. Because this effort is ongoing, I cannot otherwise comment on our activities and the activities of other attorneys general regarding the tire recall.

I want to urge this Committee, in any legislative action it takes, to tighten the recall laws and expand the responsibilities, enforcement and penalty options available to the National Highway Traffic and Safety Administration. At the same time, I want to urge the Committee to ensure that any such changes clearly preserve the right of each State Attorney General to protect their consumers in state court under our respective consumer protection acts. Specifically, I would request that any such legislation specifically state that any such law, regulation or rule does not limit or restrict the applicability of state consumer protection laws or unfair or deceptive trade practice statutes but rather shall serve as supplemental authority for the protection of consumers.

The State Attorneys General have been and continue to serve as important soldiers in the battle to protect and enforce the rights of consumers. By way of example, under the current voluntary recall, it is important that commitments made by Firestone and Ford Motor Companies to the public in advertisements and other public notices must be honored under consumer protection acts. For illustrative purposes, if a company promotes to the public that as part of its customer service program a consumer can return an item for reimbursement but mid-stream the company changes their mind and refuses to accept return of the item for reimbursement, a violation of the Tennessee Consumer Protection Act has occurred and I can enforce that commitment to the public.

On the other hand, if businesses are taking advantage of the recall program by selling recalled tires and telling consumers they can purchase the used tires for a small amount of money and then turn them in to Firestone for brand new tires under the recall, I can take action under our consumer protection act to protect consumers from the sale of an unsafe product. I can also take action against the reselling party for failure to inform the consumer that a tire is under recall. Such actions are essential to prevent the public from injury. Because NHTSA will rightfully be concerned about national trends and issues, they will not have the time or resources to focus on more localized issues associated with a recall. State Attorneys General Offices are nearer to their consumers so we can act quickly to stop localized problems such as the resale of recalled products in a small community in our state. Again, I urge you to keep these important public protections in place as you proceed with legislation.

The State Attorneys General will continue to make excellent enforcement partners with the federal government to protect consumers from unsafe products or from companies which misrepresent their products to consumers or fail to inform consumers of the defects in their products thereby putting consumer's lives at risk, if you ensure any upcoming legislation does not limit our abilities. If you have any questions or comments regarding this written statement, please feel free to contact me directly or Deputies Attorney General, Cynthia Kinser (615-741-6422) or Dennis Garvey (615) 741-3613 of my staff. Thank you for permitting me this opportunity to voice my views before this Committee. I would greatly appreciate you distributing this to the Committee and placing it in the record on September 21, 2000.

Sincerely,

PAUL G. SUMMERS
Attorney General & Reporter
(615) 741-6474

cc: The Honorable Ed Bryant
408 Cannon House Office Building
Washington, DC 20515-4207

The Honorable Bob Clement
2229 Rayburn House Office Building
Washington, DC 20515-4205

The Honorable John J. Duncan, Jr.
2400 Rayburn House Office Building
Washington, DC 20515-4202

The Honorable Harold E. Ford, Jr.
1523 Longworth House Office Building
Washington, DC 20515-4209

The Honorable Bart Gordon
2201 Rayburn House Office Building
Washington, DC 20515-4206

The Honorable Van Hilleary
114 Cannon House Office Building
Washington, DC 20515-4204

The Honorable William L. Jenkins
1708 Longworth House Office Building
Washington, DC 20515-4201

The Honorable John S. Tanner
1127 Longworth House Office Building
Washington, DC 20515-4208

The Honorable Zach Wamp
423 Cannon House Office Building
Washington, DC 20515-4203

Mr. BRYANT. Thank you, Mr. Chairman. This will be a small portion. He writes and says: I want to urge this committee in any legislative action it takes, to tighten the recall laws and expand the responsibilities, enforcement, and penalty options available to NHTSA. At the same time, I want to urge the committee to ensure that any such changes clearly preserve the right of each State attorney general to protect their consumers in State court under their respective consumer protection acts. Specifically, I would request that any such legislation specifically state that any such law, regulation, or rule does not limit or restrict the applicability of State consumer protection laws or unfair or deceptive trade practice statutes, but, rather, shall serve as supplemental authority for the protection of consumers.

With that, Mr. Chairman, I would yield back the balance of my time.

Mr. TAUZIN. Thank you.

The chairman would also like to make one public announcement that I think is equally as important as the attorney general's work. One of our members reported to us that in his State, a major rental company rented a Ford Explorer to an individual with recalled tires on them and claimed that they were not subject to the recall because they had not yet experienced 20,000 miles.

There is no such limitation on the recall. All those tires are recalled, regardless of mileage, and any rental company advising any consumer that recalled tires are okay if they are under 20,000 miles is giving bad information to consumers, and those tires should be replaced pursuant to the recall.

The Chair thanks the gentleman. Any further requests for opening statements? The gentlelady is recognized, Mrs. Cubin.

Ms. CUBIN. Thank you, Mr. Chairman. This issue is of particular interest to me since one of our family vehicles in Wyoming is a 1994 Ford Explorer. Like many Ford Explorers, it came with standard Firestone tires. Those tires are no longer on our Explorer, because while my son was driving it on a hot August day at 75 miles an hour, which is the speed limit in Wyoming, one of the tires blew out. The tread separated. We immediately took that car and had all of the tires replaced except for the spare, which we will be doing as well. I sincerely thank God from the bottom of my heart that my son is not one of the people that are represented on that chart, but I also know as I sit here that he very well could be.

So I will try to do what the chairman said. I will try to keep emotions and anger out of this discussion. But I have to tell you, I sympathize with the parents who have lost children, with families who have lost loved ones when it possibly could have been prevented. Nobody wants to play the blame game. I generally think blaming isn't a productive thing to do. I think generally assessing a situation and deciding how we go from here is the best thing to do. But we need to have this problem solved. We need to have safe products to begin with.

This committee has the responsibility to the public to look at ways to ensure that future episodes like this do not happen and that more episodes like the ones that we are involved with today don't happen. I am pleased with the wealth of knowledge that the chairman has asked to come before us today but I want you to know there are many tough questions yet to be answered about the safety, the design, and the testing of Firestone tires. I hope that you will have the answers that we are looking for.

Finally, I think we need an update on where NHTSA is and Ford and Firestone are with answering why these events happened in the first place, and how they intend to apply the knowledge they have already gained to make sure there won't be future problems.

The last situation that has come to my attention is with Continental's tires on Lincoln's Ford Navigator. I think it should make everyone sit up and take notice if they haven't already. I yield back the balance of my time, Mr. Chairman.

Mr. TAUZIN. Again, I thank the gentlelady.

Further opening statements. The gentleman from California.

Mr. BILBRAY. Thank you, Mr. Chairman. First of all, I would like to congratulate the vice president from Ford on a sales strategy in San Diego which obviously has been very successful over the past few years, because as I was walking precincts in my district this past weekend, it was extraordinary how many people asked about this issues because they own Explorers. In San Diego, we probably have more of your products on line there than even some States do, and I think it is part of the different cultures, the fact that SUVs have been modified from a working vehicle to the preferred vehicle of the suburban mother and parent.

I think because of that I feel very strongly we need to get some answers. As I was going door to door, they were asking questions of their Member of Congress, saying, Where do I go, what is the future? And the questions are great. So many people say, I am waiting for my new tires. I continue to have to address this issue.

I hope that I am able to get the answers today so we can take it back to San Diego and tell all of these people, especially the mothers that use these vehicles as the preferred means of transportation for their families, that we can avoid a problem to where you don't have a son, an adult, not only an adult son being in danger, but all of these children that can't control what they are going to drive and the mothers that basically have to address the issue.

Mr. Chairman, I want to thank you for this hearing. I want to thank you for continuing to get the information out, to find answers so that the citizens of San Diego County and the entire United States can address this issue, because I think it runs very, very close to all of our households. I want to thank you and the ranking members of not only the subcommittees, but of the full committee, of the cooperative effort between the majority and the minority on this issue. I appreciate the fact that we are seeing Democrats and Republicans searching for answers, not just looking for political advantage or looking to point fingers, and I want to thank you very much and I want to thank the ranking member for that kind of cooperative effort.

I think this hearing and this legislation is going to be something that Americans look to as the ability of Washington to identify a problem and to address it comprehensively without trying to take political advantage on the issue.

I yield back the balance of my time.

Mr. TAUZIN. Thank you, Mr. Bilbray.

Further requests for opening statements?

[Additional statements submitted for the record follow:]

PREPARED STATEMENT OF HON. PAUL E. GILLMOR, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF OHIO

Mr. Chairman, I want to thank you for calling this important second hearing to look into the important matter of these unnecessary traffic deaths.

I look forward to hearing from our witnesses and the story they have to tell. Many times this town is more bent upon finding and laying blame than it is about accepting responsibility and making corrective action. While every accident that occurred is tragic and costly enough in the way that someone's father, mother, sibling, or brother passed away, those deaths will mean nothing if we do not comprehensively approach this problem and seek out solutions.

This committee has spent much time and attention looking into the integrity of and the quality control over Firestone's ATX, ATX II, and Wilderness tires. This is important as a majority of the accidents involved these tires. However, I believe it is equally important to look at the vehicles concerned. The vast number of the tires that failed, and which precipitated the vehicles to rollover, kept occurring in the same place. This indicates to me that engineering questions as they relate to the suspension of the Explorer must not be ignored. In addition, the recent press accounts concerning the Lincoln Navigator, a Ford Explorer-type auto, and tire problems; makes me concerned that these road hazards are not just limited to the Firestone and Ford products covered in the first hearing.

Mr. Chairman, the things we do here do make a difference. However, at the end of the day, our panel will not be known for the speed in which it acted, but the thoroughness and thoughtfulness in which it proceeded. I commend you for moving quickly to help Americans who drive these products and those who share the road with them. I would, however, urge caution in presupposing a conclusion in this matter. Our nation's history is replete with examples of good legislative intentions with a bad practical outcome.

Again, I am glad we are here for this second hearing and look forward to reaching a point where consumers can feel safe in purchasing and using these products again.

PREPARED STATEMENT OF HON. ELIOT L. ENGEL, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF NEW YORK

Mr. Chairman, I want to thank you for calling this hearing and I want to thank the members of the panel for joining us today. I hope this hearing will be informative and shed light on an issue of great concern to us all.

We certainly cannot go back and fix the problems that have led us here today. However, we can move forward and work to ensure that this terrible situation is never repeated again. We all have questions that we hope will be answered today. We have questions that the American people want answered. Unfortunately we may not get the answers that we would like.

There is an apparent problem in how tires are tested. It seems that specifications on tires are not what they appear to be. When a consumer reads a tire specification label he may read that a tire is rated for a certain speed.

However, the consumer is unaware that the tire was only tested at that speed for a limited time, when in fact the tire will be operated for a much longer period of time at that speed. Therefore, there is no way to tell how the tire will react under extensive use. While these tests may have met or even exceeded the National Highway Transportation and Safety Administration (NHTSA) standards, the question remains, are these standards adequate.

Another area of concern to me is whether or not there is sufficient communication between the tire manufacturers and the auto manufacturers. For instance, are the tires adequately tested for the vehicle in which they will be mounted. A tire tested at a certain speed and weight does not indicate how the tire will behave on a particular vehicle. In this case, it seems that the Firestone ATX tires were never tested while mounted on a Ford Explorer. That is troubling to me.

Furthermore, all of the tests performed on tires are conducted with tires directly off of the assembly line. We, therefore, have no idea how a tire will behave after it has aged and worn. Is current testing adequate? It seems to me that it is not. I look forward to hearing the testimony of our witnesses and hope we can find the answers to the many questions before us today.

Mr. TAUZIN. Then the Chair will recognize and introduce the panel. We are pleased to welcome Dr. Sue Bailey, the Administrator of the National Highway Traffic Safety Administration, together with Mr. John Lampe, Executive Vice President of Bridgestone/Firestone; Mr. Dan Saurer from the Division of Technology for Bridgestone/Firestone; Ms. Helen Petrauskas, Vice President for Safety and Engineering for the Ford Motor Company; and Mr. Thomas Baughman, Engineering Director for the Truck Division Business Group of Ford Motor Company.

You will be recognized to summarize in 5 minutes your statements and Members will have 10 minutes to ask questions of you as we go through this hearing today. So we will begin with Dr. Bailey of the National Highway Traffic Safety Administration. Welcome again, Dr. Bailey. We appreciate your testimony.

Before we do that, this is an O&I hearing, and before you testify, we swear the witnesses in. Mr. Upton will give the oath.

Mr. UPTON. We have a long history of taking testimony under oath. Does anybody have objection? If not, does anybody need to be represented by counsel?

If not, would you stand and raise your right hand?

[Witnesses sworn.]

Mr. UPTON. You are now under oath. Dr. Bailey, we will start with your testimony.

TESTIMONY OF HON. SUE BAILEY, ADMINISTRATOR, NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION, U.S. DEPARTMENT OF TRANSPORTATION

Ms. BAILEY. Thank you, Chairman Upton. Mr. Chairman and members of the committee, I am pleased to appear before you this morning to address the subject of regulatory actions to improve the safety of motor vehicle tires. I welcome the opportunity to address this very important issue.

When I testified before the committee on September 6 concerning Firestone's recall of its ATX, ATX II and Wilderness tires, several members expressed concern about the adequacy of our Federal tire regulations. I stated at that time that the agency needed to review the standard and update it. Today I will suggest some directions in which our review may lead us.

The National Highway Traffic Safety Administration has two Federal motor vehicle safety standards applicable to tires: Standard No. 109, which applies to passenger car tires, and Standard No. 119, which applies to tires for vehicles other than passenger cars. Both of these standards have been on the books for a long time.

The tire standards call for a tire to pass several performance tests. The tests which could be the most relevant to the tread separation problem in the Firestone tires are the tests for high speed performance and endurance. Firestone certified that the ATX and Wilderness tires met Standard No. 109, the standard to which most tires used on SUVs are certified. We tested them on more than one occasion in our standards enforcement program and found that they all passed the performance tests, including the high speed and endurance tests that we now use.

When high speeds are combined with low inflation pressure and heavy loads, the tires are heavily stressed. Add in the effects of high temperature, and you have a recipe for maximizing stress on a tire. We will look at both speed and temperature in our review of the tire standard and we will consider the vehicle loading and tire inflation practices of the owners themselves.

This inquiry is one of special importance for tires used on SUVs, compacts, pickup trucks, and other vehicles whose center of gravity is high in relationship to their track width. If a tire fails suddenly, causing a driver to lose control, an SUV is more likely than a passenger car to roll over. The growing percentage of SUVs and other vehicles with high centers of gravity increases the importance of having tires with adequate margins of safety. Our rulemaking will examine whether the characteristics of these vehicles warrant the amendment of other requirements in the standard.

There is also a significant issue of consumer information that needs to be addressed. We believe the public needs better information about the performance characteristics of the vehicles and the equipment it purchases. We are pleased to hear that the conferees on our appropriations bill may modify a provision in the bill so that it will not delay our consumer information rating system on such rollovers.

We believe that the information developed through this system will provide relevant information to those consumers. We will also review other means of supplying consumer information, such as the labeling requirements on the tires and the location of tire inflation pressure information on the tires.

I want to stress that we are already in the process of considering possible changes to these standards. Updating the standards is vitally important to assure that the American public is safe on their tires. Mr. Chairman, I want to assure as I have before that the Firestone investigation is our highest priority at NHTSA. We will remain focused on the investigation, and closely monitor the current recall campaign. We will also seek any expansion of that campaign that may be necessary.

I want to thank you for holding this very important hearing, and I will answer any questions that you may have.

[The prepared statement of Hon. Sue Bailey follows:]

PREPARED STATEMENT OF HON. SUE BAILEY, ADMINISTRATOR, NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION

Mr. Chairman and members of the Committee: I am pleased to appear before you this morning to address the subject of regulatory actions to improve the safety of motor vehicle tires. I welcome the opportunity to address this important issue.

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The National Highway Traffic Safety Administration (NHTSA) has two Federal motor vehicle safety standards applicable to tires: Standard No. 109, which applies to passenger car tires, and Standard No. 119, which applies to tires for vehicles other than passenger cars. Both of these standards have been on the books a long time—Standard No. 109 since 1968 and Standard No. 119 since 1973—without major changes.

The tire standards call for a tire to pass several performance tests. The tests that could be the most relevant to the tread separation problem in the Firestone tires are the tests for high speed performance and endurance. Firestone certified that the

ATX and Wilderness tires met Standard No. 109, the standard to which most tires used on SUVs are certified. We tested them on more than one occasion in our standards enforcement program and found that they passed all the performance tests, including the high speed and endurance tests.

When high speeds are combined with low inflation pressure and heavy loads, the tires are heavily stressed. Add in the effects of high temperature, and you have a recipe for maximizing stress on a tire. We will look at both speed and temperature in our review of the tire standard, and consider the vehicle loading and tire inflation practices of vehicle owners.

This inquiry is of special importance for tires used on SUVs, compact pickup trucks, and other vehicles whose center of gravity is high in relation to their track width. If a tire fails suddenly, causing a driver to lose control, a SUV is more likely than a passenger car to roll over. The growing percentage of SUVs and other vehicles with high centers of gravity increases the importance of having tires with adequate margins of safety. Our rulemaking will examine whether the characteristics of these vehicles warrant the amendment of other requirements in the standard.

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I want to stress that we are already in the process of considering possible changes to these standards if they will improve safety. Updating the standards is vitally important to assure the American public of the safety of tires.

Mr. Chairman, I want to assure you, as I have before, that the Firestone investigation is

the highest priority in NHTSA. We will remain focused on the investigation, closely monitor the current recall campaign, and seek any expansion of the campaign that may be necessary.

Mr. Chairman, I will conclude by expressing my thanks to you for holding this hearing. I will be glad to answer any questions you may have.

Mr. TAUZIN. Thank you.

We will now hear from Mr. Lampe, the Executive Vice President of Bridgestone/Firestone.

TESTIMONY OF JOHN T. LAMPE, EXECUTIVE VICE PRESIDENT, BRIDGESTONE/FIRESTONE, INC.; ACCOMPANIED BY DAN SAURER, DIVISION VICE PRESIDENT FOR TECHNOLOGY, BRIDGESTONE/FIRESTONE, INC.

Mr. LAMPE. My name is John Lampe and I am the Executive Vice President with Bridgestone/Firestone. Mr. Chairman, we are pleased to be here today to appear before you to discuss some very important aspects of this recall. Let me repeat at the outset that our company recognizes that there was a problem with a very small percentage of our tires. We must and we do take full responsibility for these problems.

Before going into the substance of my remarks, let me tell you that this recall situation has impacted our company and our 35,000 employees like no other event in our 100-year history. We are a proud company with a long history and a tradition of customer service and satisfaction. The fact that our customers are now questioning our commitment to them and our commitment to their safety has shaken us to our core. We are fully committed to concluding this recall as quickly as possible and to identifying the cause or causes of the tire problems.

In order to be brief and meet the time limit, I will limit my opening remarks to three subjects: recommended inflation pressures to be equipped on the Ford Explorer; how tires are tested; and a brief update on our root cause analysis of the problem with the recalled tires.

First, air pressure. As is the case with all vehicles, the vehicle manufacturer sets the air pressure as was done on the Explorer. Why? Because the vehicle is an integrated system and the tires are only a part of the system. Air pressure of the tire is interrelated with many other performance characteristics, including handling, rollover stability, traction, suspension load and so on. We are not vehicle experts and cannot know what various impact various pressure settings will have on the vehicle system as a whole. Typically, if the inflation pressure meets tire and rim load standards at 26 psi and the vehicle manufacturer believes that 26 psi is optimal for the vehicle's total performance, we must rely on that judgment.

However, we now know that at 26 psi, there is a very low safety margin for the Explorer as compared to some other SUVs. Running an Explorer on low tire pressure, overloaded, in hot climates, appears to be a serious part of the problem that we are now facing. Since August 9, Ford has stated that an inflation pressure range between 26 psi and 30 is proper for the P235 75R 15 tires equipped on the Explorer and, we as the tire manufacturer, have recommended the air pressure on these tires on the Explorer at 30 psi. We believe very strongly that 30 psi provides consumers with additional safety margins. At 30 psi, the Explorer can handle higher speeds and over 400 pounds greater load than at 26. We feel so strongly on this that yesterday we wrote a letter to Ford to urge them to change the specification on these tires on these Explorers and Mountaineers that are equipped with P235 75R 15 to 30 psi.

Turning to testing, we know how to test tires. Every year we test thousands of tires for millions of miles at different loads, speeds, and inflation levels. We subject tires to severe abuse and tests we have created to run these tires to failure so we can assess the outer limits of a tire's ability to perform.

The recalled tires were subjected to a series of exacting tests before they were introduced. First, Ford Motor Company required a series of tests before the tires could be certified as original equipment on Ford vehicles. Those tests were performed either by Ford or by Firestone as directed by Ford in its engineering specifications.

Second, Firestone tested the tires in accordance with DOT regulations, which call for high speed, durability, and other tests.

Third, at Ford's request, starting with the 1995 model year, Firestone tested the tires under standards developed by the Society of Automotive Engineers for the purpose of speed rating, tests that are much more severe and extreme than the standard 109 test.

Mr. Chairman, your staff and now the media have expressed concern about high speed endurance testing at Decatur in 1996 as well as the modification that we made in 1998. We will answer all of your questions to the best of our ability on all of these subjects. I am fortunate to have one of my colleagues here today that is very familiar with both subjects. In addition to the extensive testing, Firestone's quality assurance procedures require regular testing of tires taken right from the production lines to assure the continuing safety of our tires.

Overall, the testing that Ford and Firestone undertook before introducing these tires was thorough and complete. However, we pledge our cooperation with the committee and NHTSA in reevaluating tire testing standards and addressing the critical matter of tire and vehicle interaction in accident causation.

Let me speak a moment about root cause. We are all interested in that, nobody more so than us. After the recall was announced, Bridgestone/Firestone management immediately created an investigative team to study and determine the cause of the thread separation phenomena. They were joined by groups of personnel from the Decatur, Illinois plant, professionals from the Akron Technical Center and field engineers and technical experts from around the United States as well as from our parent company, Bridgestone Corporation, Japan. A team of Ford Motor Company specialists also participated in the efforts. All of these groups have continued to work both individually and jointly in search of an answer to this problem.

No one wants to have an answer more than we do. We have been and are continuing to relentlessly examine all known facts relevant to these tires. A comprehensive review of the Decatur production process has been conducted to determine whether variances in any production process could have caused or contributed to this problem which appears in a very small percentage of these tires. I want to make clear and be honest with the committee, we have not come to a conclusion about the cause or causes of this problem, but we have identified some areas where we believe additional work can be fruitful. Specifically, we are looking at the interaction between the design specification of the P235 15 together and combined with the potential manufacturing variances, process variances, at the Decatur plant.

Mr. Chairman and members of the committee, I think it would be improper on my part to engage in future speculation and theories. We must rely on our experts, including the independent expert that we have brought on, Dr. Sanjay Govindjee, to an unfettered opportunity to investigate and answer this problem which has been aptly likened to finding a needle in a haystack.

Mr. Chairman, we take full responsibility where there is a problem with our tires. We firmly believe, however, that the tire is only part of the overall safety problem shown with these accidents. Mr. Chairman and members of the committee, we believe that all of the relevant safety issues must be addressed. If we remove every one of our tires from these vehicles, rollovers and serious accidents will still continue.

Mr. Chairman, we pledge our cooperation with the committee and with NHTSA to work to ensure the safety of the motoring public. Thank you for your time and we welcome any questions that the committee has.

Joining me today here are Dan Saurer, Division Vice President, Technology Company, and he will address the more technical questions that you may have.

Mr. TAUZIN. Thank you. And my understanding is that Mr. Saurer will not give an opening statement.

Mr. LAMPE. That was for both of us.

[The prepared statement of John T. Lampe follows:]

PREPARED STATEMENT OF JOHN T. LAMPE, EXECUTIVE VICE PRESIDENT, BRIDGESTONE/FIRESTONE, INC.

Chairman Tauzin, Chairman Upton and members of the House Commerce Committee, Bridgestone/Firestone is pleased to have the opportunity to appear before you today to discuss some very important issues regarding the tire recall situation.

Let me repeat at the outset that BFS recognizes that there was a problem with a very small percentage of the recalled tires. That is why we took the action that we did. Before going into the substance of my remarks, let me tell you that this recall situation has impacted our company as no other event has in our 100 year history. We are a proud company with a century long tradition of customer service and satisfaction. The fact that our customers are now questioning our commitment to them and to their safety has shaken us to our core. We are fully committed to concluding this recall as quickly as possible and to identifying the cause or causes of the tire problems.

I will limit my opening remarks to three subjects—Recommended PSI for tires to be equipped on the Explorer; how tires are tested; and a brief update on the root cause analysis of the problems with the recalled tires.

First, air pressure. As is the case with all vehicles, the vehicle manufacturer sets the air pressure on the Explorer. Why? Because the vehicle is an integrated system and the tires are only a part of that system. Air pressure of the tire is interrelated with many performance characteristics, including handling, rollover stability, traction, suspension, and load. We are not vehicle experts and cannot know what impact various pressure settings will have on the vehicle system as a whole. Typically, from our perspective, if the inflation level meets Tire and Rim load standards at 26 PSI and the vehicle manufacturer believes that 26 PSI is optimal for the vehicle's performance, we must rely on that judgment.

However, we now know that at 26 PSI, there is a low safety margin for the Explorer as compared to other SUV's. Running an Explorer at low tire pressures, overloaded, particularly in hot climates appears to be a part of the problem we are now facing. Since August 9, Ford has stated that an inflation pressure range of 26 PSI to 30 PSI is proper for the P235 75R 15 tires equipped on the Explorer and we, as the tire manufacturer, have recommended that the air pressure on these tires equipped on the Explorer be inflated to 30PSI. We believe that 30 PSI provides the consumer with additional safety margin; at 30 PSI, the Explorer can handle higher speeds and over 400 lbs. greater load than at 26 PSI.

Turning to testing, Firestone knows how to test tires. Every year we test thousands of tires for millions of miles at different loads, speeds and inflation levels. We subject test tires to severe abuse and test to create failure, so we can assess the outer limits of a tire's ability to perform.

The recalled tires were subjected to a series of exacting tests beforethey were introduced. First, Ford Motor Company required a series of tests before the tires could be certified as original equipment on Ford vehicles. Those tests were performed either by Ford or by Firestone, as directed by Ford in its engineering specifications. Second, Firestone tested the tires in accordance with DOT regulations, which call for high speed, durability, and other tests. Third, at Ford's request starting with the 1995 model year, Firestone tested the tires under standards developed by the Society of Automotive Engineers for purposes of speed rating the tires. The recalled tires performed just the way they should on these tests and were ultimately approved by Ford.

In addition to this extensive testing, Firestone's quality assurance procedures require regular testing of tires taken from the production lines to assure the continuing safety of tires produced.

Overall, the testing Ford and Firestone undertook before introducing these tires was thorough and complete. However, we pledge our cooperation with the Committee and with NHTSA in re-evaluating tire testing standards and in addressing the critical matter of tire and vehicle interaction in accident causation.

Let me speak a moment about root cause. After the recall was announced, Bridgestone/Firestone management immediately created an investigative team to study and determine the cause of the tread separation phenomena. They were joined by groups of personnel from the Decatur, IL plant, professionals from the Akron Technical Center, and field engineers and technical experts from around the United States as well as from our parent company Bridgestone Corporation, Japan. A team of Ford Motor Company specialists has also participated in that effort. All of these groups have continued to work both individually and jointly in search of an answer to this problem.

No one wants to have an answer more than we do. We have been and are continuing to relentlessly examine all known facts relevant to these tires. A comprehensive review of the Decatur production process has been conducted to determine whether variances in any production process could have caused or contributed to this problem, which appears in such a small percentage of these tires. We have engaged in an intensive review of our development and design processes to determine any role they might play in these issues. We are presently examining, dissecting, and analyzing a large sample of representative tires acquired in the recall in an effort to closely evaluate the condition of tires that have experienced actual service conditions.

At this time, I want to make it clear that we have not been able to come to any conclusion about the cause or causes of this rare problem, although we have identified some areas where we believe additional work will be fruitful. Specifically, we are looking at the interaction between the design of the P235/75R15 and potential manufacturing variances at the Decatur plant. It would be inappropriate on my part to engage in further speculation. We must allow our experts, including the independent expert, Dr. Sanjay Govindjee, the unfettered opportunity to investigate and answer this problem, which has been aptly likened to “finding a needle in a haystack.”

Mr. Chairman, we pledge our cooperation with the Committee and with NHTSA to work to ensure the safety of the motoring public. Thank you for your time and we welcome any questions the Committee has. Joining me here today are Dan Saurer, Division Vice President, Technology Company, and Brian Queiser, Project Engineer, who will address any of the more technical questions you may have.

Mr. TAUZIN. Thank you.

We will now turn to Ford Motor Company, Ms. Helen Petrauskas.

TESTIMONY OF HELEN O. PETRAUSKAS, VICE PRESIDENT, ENVIRONMENT AND SAFETY ENGINEERING, FORD MOTOR COMPANY; ACCOMPANIED BY THOMAS D. BAUGHMAN, ENGINEERING DIRECTOR, TRUCK CONSUMER BUSINESS GROUP, FORD MOTOR COMPANY

Ms. PETRAUSKAS. Thank you, Chairman Tauzin, Chairman Upton. I am pleased to have the opportunity to be here. Most of my statement talks about the technical issues, but I was so struck by what Congresswoman Cubin said. I personally get e-mails and calls and letters from customers: When are we going to get our tires replaced? And truly we have a group of people that are literally dedicated to working on that around the clock. That is not an exaggeration.

Some of the good news is that we paid for some tire manufacturing equipment so that competitive tires could be made available more quickly, and it looks like there will be another 300,000 tires every month, by the end of September, so my hope is that will help at least some of the people who expressed the same sentiments that you expressed so eloquently and relieve their worry and concern over their family and children.

Ford has provided extensive documentation to the committee,and that documentation related to two particular questions: First, we have provided documents on tire testing. Second, we have provided documents relating to the testing and performance of the Explorer vehicles with respect to handling and stability.

With respect to tire testing, the documents we provided to your committee conclusively demonstrate that Ford performed thorough, complete, and rigorous testing of the subject tires. They will also show that for the better part of 10 years Firestone agreed and repeatedly supported and certified to the recommended tire pressure of 26 psi. And then finally, the documents will demonstrate that all of the requisite testing which needs to be done at the recommended customer tire pressure was done at the recommended tire pressure.

A great deal of attention has been paid to high speed testing. Specifically, our test procedure provides that testing should be done by running the tires for at least 200 miles, at a minimum speed of 90 miles per hour, with the pressure as recommended to the customer. The test was conducted for the four different 15-inch tires used on the Explorer since its introduction. Typically this testing is done on a slave or mule vehicle that is modified to duplicate the weight distribution of each of the vehicles that will use the tires being tested, and I have a feeling I am going to get the opportunity to explain all of that to the committee.

In terms of vehicle handling and stability, the starting point for Ford Motor Company's approach to continuous improvement to safety of all of our products is the Ford safety design guidelines. These guidelines are continuously updated——

Mr. TAUZIN. Ms. Petrauskas, could I interrupt you?

There is a big bag someone left outside this room. If it is your bag, please immediately claim it; otherwise the Capitol Police are going to be obliged to clear this room. So if you have left a bag outside, take care of it quickly, right now. Can I ask the gentleman that is leaving, is that your bag? You'll take care of it quickly. Thank you. Please proceed.

Ms. PETRAUSKAS. The starting point for Ford Motor Company's approach to continuous improvement to safety for all products is Ford's safety design guidelines. These guidelines are continuously updated, and they go well beyond government regulations. The safety guidelines are intended to provide continuous improvement to enhance the already extensive Ford efforts to provide vehicles that exhibit a high level of safety. Prominent among the safety guidelines is Ford's guideline on resistance to rollover. The objective of this guideline is to design and develop a vehicle that will remain stable under all operating conditions, including accident avoidance maneuvers. The guideline states that the vehicle should respond in a predictable manner and give the driver perceptible signals that the vehicle is at its limit. Our extensive handling testimony is supplemented by specific testing focusing on vehicle behavior and violent maneuvers.

One of the most extreme tests is the so-called J-turn test, a test that was performed on the 1991 Explorer. The Explorer met or exceeded all J-turn criteria, not only at the recommended tire pressure of 26 psi, but also at the maximum tire pressure for the ATX tire of 35 psi. This conclusion was validated by both track testing and computer simulation. And it continues to be validated by real world performance. Even including the accidents likely caused by thread separations, the Explorer continues to perform 27 percent better than the average passenger car and 17 percent better than the average compact SUV in serious accidents. It also continues to perform better than comparable SUVs, and there is a chart up there that demonstrates that; and fundamentally what it says, in all serious accidents and in rollover serious accidents, the performance of the Explorer is significantly better than that of the average SUV.

Finally, contrary to assertions made in the press as recently as yesterday, an evaluation of single vehicle rollover accidents, that is, accidents not where two vehicles or more are involved, simply there is a single vehicle involved in the accident, that same government data base demonstrates that the Explorer performs better in these kinds of crashes than the average compact SUV.

Finally, some have asked whether Explorers are more likely to suffer a rollover after a catastrophic thread separation. The fact is that the Explorer had the misfortune of being equipped with virtually all of the recall tires that were produced. But even with that considerable handicap, Federal Government statistics show the Explorer to be one of the safest vehicles on the road, both in single accidents and in multiple vehicle accidents.

Let me just say in conclusion, we have done our utmost to provide the committee with everything that has been requested. The submission includes formal sign-off documents, engineering reports, comprehensive data tabulations, but it also includes engineers' handwritten notes and their e-mails to one another and vast amounts of testing done at design levels other than the design level that ultimately went into production. These documents paint a picture of the day-to-day work of engineers as they develop a product. They reflect debates among engineers as to alternatives that might be considered and differences of opinion as to the best approach to be taken. There are letters to suppliers, including tire suppliers, indicating improvements are needed in one or another characteristic. But also reflected in all this paper is the constant striving of thousands of Ford Motor Company men and women to make a better product. Thank you.

[The prepared statement of Helen O. Petrauskas follows:]

PREPARED STATEMENT OF HELEN O. PETRAUSKAS, FORD MOTOR COMPANY

Good morning, Chairman Tauzin, Chairman Upton, and Members of the Committee. I appreciate the opportunity to be here today to provide you with additional information on the Firestone tire recall. In response to your committee's request, Ford has provided extensive documentation related to two testing issues. First, we have provided documents on the testing done by Ford or by the tire manufacturer of Firestone ATX, ATX II, Goodyear Wrangler and Firestone Wilderness tires. Second, we have provided documents related to the testing and performance of the Explorer with respect to handling and stability.

Tire Testing

The documents we provided your committee conclusively demonstrate that Ford performed thorough, complete and rigorous testing of the subject tires. Additionally, Firestone agreed and has repeatedly supported the recommended tire pressure of 26 psi. Finally, the documents demonstrate that all requisite testing was done at 26 psi, the tire pressure recommended to our customers.

We have provided more than 100,000 pages of documentation to the Committee (Attachment 1). These documents include detailed descriptions of the governance process—Design Verification Plan and Report (DVP&R)—that our vehicle teams follow to approve tires for production. The DVP&R, in turn, is supported by specific test procedures that make up the elements of our sign-off process. These have also been provided. We have provided as many documents setting forth the specific results of the required tests as we could find.

The tire Design Verification Plan and Report is a combination of supplier and vehicle manufacturer testing. The supplier is responsible for conducting a wide variety of tests to insure the tire meets Ford's functional requirements and government regulations. For example, supplier testing is required to confirm acceptable rolling resistance, wet and dry traction, and tire wear. Ford conducts vehicle testing to insure the tires performance is acceptable in conjunction with other vehicle systems. These tests address performance characteristics such as handling, traction and stability.

In all, nearly 30 groupings of tests are required as part of Ford's Design Verification Plan and Report—a complete list and description of these tests is included in Attachment 2.

One example of Ford's comprehensive approach to tire testing is the way we determine the speed rating of tires. The standard industry procedure to establish speed rating—Society of Automotive Engineers (SAE) procedure number J1561 provides that all tires be tested at 38 psi. The Tire and Rim Association requires that an analytical calculation be used to adjust the speed rating to the tire pressure recommended to customers. Ford's procedure number ES-XU5A-1508-AA requires that speed rating be determined by running the test *at the actual tire pressure recommended* to the customer. In order to provide an *additional margin of real world safety, Ford* requires that its tires actually meet a "higher" speed rating, above the maximum vehicle speed. Thus, the tires that are the subject of this hearing all demonstrated "passing" performance at 26 psi at the "S" level even though the maximum speed of the Explorer is one speed rating category lower.

A great deal of attention has been paid to high speed testing. We want to emphasize what actions were taken. Specifically, our test procedure provides that testing should be done by running the tires for at least 200 miles at a minimum speed of 90 miles per hour at an ambient temperature between 70 and 90 degrees Fahrenheit with tire pressure as recommended to the customer. This test was conducted for the four different 15 inch tires used on the Explorer since its introduction—the Firestone ATX, ATX II, and Wilderness AT and the Goodyear Wrangler. Typically, this testing is done on a "slave" vehicle that is modified to duplicate the weight distribution of each of the vehicles that will use the tires being tested.

We have been able to find two of the track worksheets used by the engineers who performed this high speed testing. In the case of the earliest test, performed in 1989, we have not been able to locate the track worksheet. However, we have identified the engineer who performed the testing and have provided an affidavit from him. And we are continuing to search for the remaining test track worksheet.

Documents we have provided show that the recommended tire pressure of 26 psi was selected by Ford to provide the optimum balance of many functional characteristics. These include: performance features such as high speed durability, load carrying capacity, fuel economy, customer comfort characteristics, and stability and handling. This is illustrated in Attachment 3. Numerous other manufacturers of compact SUVs and pickup trucks also recommend 26 psi in their vehicles. So the Ford Explorer is hardly unique in that respect.

The documents we have submitted also show that Firestone repeatedly and consistently agreed to and supported the recommended tire pressure of 26 psi.

Vehicle Handling and Stability Testing

The starting point for Ford Motor Company's approach to continuous improvement to safety for all products is Ford's Safety Design Guidelines. These guidelines are updated constantly. They represent the high safety standards that Ford Motor Company sets for itself and which go well beyond government regulations. The most recent version of these guidelines is attached (Attachment 4). Safety Design Guidelines are intended to provide continuous improvement to enhance the already extensive Ford efforts to provide vehicles that exhibit a high level of safety.

Prominent among these safety guidelines is Ford's guideline on resistance to rollover. The objective of this guideline is to design and develop a vehicle that will remain stable under all operational conditions, including accident avoidance maneuvers. The guideline states that the vehicle should respond in a predictable manner and give the driver perceptible signals that the vehicle is at its limit.

Ford Safety Design Guidelines are supported by specific engineering test procedures relating to all aspects of vehicle handling. Each of these procedures requires that tire pressure be checked and adjusted to recommended levels, so that the testing accurately reflects what our customers are likely to experience.

As to the vehicle itself, Ford Motor Company conducts various ride and handling tests. For example, lane changes, slalom events, a handling course circuit, various understeer tests, braking tests and steering evaluations are all performed at various speeds and vehicle loading conditions. These procedures ensure that Ford's vehicles have appropriate steering and handling characteristics and a wide margin of safety.

The extensive handling testing is supplemented by specific testing focusing on vehicle behavior in violent maneuvers. One of the most extreme tests is called the "J-turn" test, a test that was performed on the 1991 Explorer. The Explorer met or exceeded all J-turn test critieria not only at the recommended tire pressure of 26 psi, but also at the maximum tire pressure for the ATX tire of 35 psi. This conclusion was validated by both track testing and computer simulation.

In providing information to the Committee, Ford included all testing results that we were able to collect in the time permitted. This means that we even included test results for prototype configurations that were not representative of the vehicle as finally produced. What is significant is that even these early prototypes met the severe J-turn test at the recommended tire pressure of 26 psi and at 35 psi. The documents show that the performance of the production version of the Explorer was better than the early prototype level. This same type of information has been provided for model year Explorers produced after 1991.

All of these rigorous tests are aimed at providing a superior margin of safety for our customer. The ultimate proof of the robust design of the Explorer and its strong stability performance is in the way it has performed in the hands of customers for more than ten years. Our analysis of real world data shows that the effect of bad tires can now be seen. Attachment 5 is a comparison of Explorer's performance with 15" Firestone tires and 15" Goodyear tires respectively. This chart shows the rate (reports per million tires produced) at which tires are noted in government fatal accident statistics as a contributing factor in rollover accidents, separated by brand of tire used as original equipment on the Explorer. These data clearly show tires are called out at a higher rate for the recalled Firestone tires, compared to the rates for Goodyear tires on Explorers.

Even including the accidents likely caused by tread separations the Explorer continued to perform 27 percent better than the average passenger car and 17 percent better than the average compact SUV (Attachment 6). Contrary to assertions made in the press as recently as today, an evaluation of single vehicle rollover accidents shows that the Explorer performs better in these kinds of crashes than the average compact SUV (Attachment 7).

Finally, some have asked whether Explorers are more likely to suffer a rollover after a catastrophic tread separation. The fact is that the Explorer had the misfortune of being equipped with virtually all of the recalled tires that were produced. But even with that considerable handicap, federal government statistics show the Explorer to be one of the safest vehicles on the road, in both single and multiple vehicle accidents.

Recall Update

Since we last appeared before your committee on September 6, we have replaced more than one million additional tires and have more than 40 percent completion of the recall. Work towards completion of this recall has progressed more quickly than any recall in history. However, we remain very concerned that there are defective tires on some of our vehicles and we will not rest until every bad tire is replaced. Last week the first newly purchased tire mold came on stream. By the end of September, an additional 300,000 tires per month will become available to customers.

As Jac Nasser, Ford's President and CEO, recently committed to your Committee and to the Senate Commerce Committee, Ford is working with the tire industry to develop an "early warning reporting system." This system will provide information on the real world performance of tires. Since our announcement, we have already started meeting with our tire suppliers and are actively developing this system.

In fact, this system is already starting to address issues. You may be aware of the recently announced Continental tire replacement program, which impacts the Lincoln Navigator. Our preliminary discussions with Continental on the "early warning" system allowed us to work together to quickly address the issue.

Finally, our product development experts are investigating a dashboard indicator for future models which would alert the driver to a potential tire problem.

Conclusion

We have done our utmost to provide the committee with everything that has been requested. The submission includes formal signoff documents, engineering reports, and comprehensive data tabulations. It also includes engineers' handwritten notes, e-mail messages to one another and vast amounts of testing done at design levels other than the design level that ultimately went into production. These documents paint a picture of the day-to-day work of engineers as they develop a product.

They reflect debates among engineers as to alternatives that might be considered, and differences of opinion as to the best approach to be taken. There are letters to suppliers, including tire suppliers, indicating improvements needed in one or another tire characteristic. And reflected is the constant striving by thousands of Ford Motor Company employees as to how we can make this product even better.

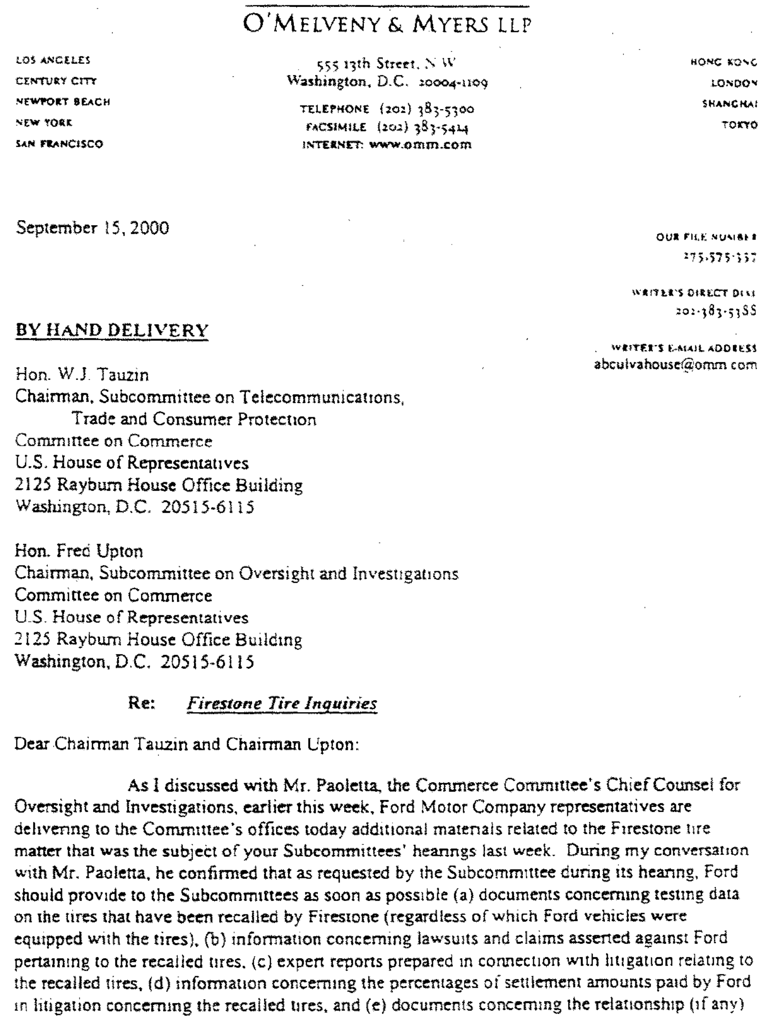
The story these documents portray is one of extremely high standards being set for a product and thorough testing and evaluation and striving for continuous improvement in all characteristics important to customers.

TESTIMONY OF FORD MOTOR COMPANY

INDEX OF ATTACHMENTS

1. September 15, 2000 Cover Letters to Committee on Firestone Tire Inquiries, referencing Ford document submission
2. Ford Design Verification Plan and Report (DVP&R)
3. Chart—Vehicle Tire Parameters—P235/75R15
4. Ford Safety Design Guidelines
5. Chart—Firestone vs. Goodyear
6. Chart—Explorer Safer than Passenger Cars
7. Chart—Compact SUV Single Vehicle Rollover Fatality Rate

Attachment 1



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Re: *Firestone Tire Inquiries*

Dear Chairman Tauzin and Chairman Upton:

As I discussed with Mr. Paoletta, the Commerce Committee's Chief Counsel for Oversight and Investigations, earlier this week, Ford Motor Company representatives are delivering to the Committee's offices today additional materials related to the Firestone tire matter that was the subject of your Subcommittees' hearings last week. During my conversation with Mr. Paoletta, he confirmed that as requested by the Subcommittee during its hearing, Ford should provide to the Subcommittees as soon as possible (a) documents concerning testing data on the tires that have been recalled by Firestone (regardless of which Ford vehicles were equipped with the tires), (b) information concerning lawsuits and claims asserted against Ford pertaining to the recalled tires, (c) expert reports prepared in connection with litigation relating to the recalled tires, (d) information concerning the percentages of settlement amounts paid by Ford in litigation concerning the recalled tires, and (e) documents concerning the relationship (if any) between the handling and stability of Explorer vehicles and the air pressure in the Firestone tires on those vehicles.

Numerous Ford personnel have been working around the clock in recent days to gather and organize the requested documents at Ford's headquarters in Dearborn, and the materials were flown to Washington earlier today for delivery to the Committee's offices. In the short time available, Ford has done its best to collect and organize these documents in a manner intended to facilitate review by the Committee's members and staff. However, if you or your staff has any questions about the materials that are being delivered or conclude that you need additional information, we stand ready to respond. With the delivery of these materials, Ford will have produced to the Subcommittees over 100,000 pages of documents since it was first contacted by Subcommittee staff in late August.

What Ford is providing

The boxes that we are delivering today contain the following materials:

(1) The documents that Ford has collected from its files which contain testing data regarding Firestone ATX, ATX II, and Wilderness tires (regardless of which Ford vehicles were equipped with the tires).

(2) The documents that Ford has collected from its files which concern the relationship between the handling and stability of Ford Explorer vehicles and the air pressure in the Firestone tires on those vehicles. (The documents in these first two categories are accompanied by a letter from Helen Petrauskas, Ford's Vice President, Environmental and Safety Engineering, and Thomas Baughman, Engineering Director, Truck Consumer Business Group. That letter sets forth information that may aid in evaluating those categories of materials.)

(3) Copies of the complaints in lawsuits that were served on the Company as of the date of the recall (August 9, 2000) in which there are allegations of tread separations in Firestone ATX, ATX II, and Wilderness tires.

(4) Copies of the initial documentation received by Ford (as of August 9, 2000) in which claims are asserted against the Company in connection with alleged tread separation events involving Firestone ATX, ATX II, and Wilderness tires.

(5) Copies of expert reports that were exchanged among Ford and other parties (as of August 9, 2000) in litigation related to alleged tread separation events involving Firestone ATX, ATX II, and Wilderness tires.

(6) Documents reflecting the settlements of lawsuits alleging tread separation events in Firestone ATX, ATX II, and Wilderness tires (as of August 9, 2000). (As I have advised you previously, Firestone's and Ford's settlements of these cases typically have not been simultaneous or coordinated. Ford normally does not know the amounts of any payments by

Firestone and therefore cannot calculate any percentages of payments by either party. However, the documents we have provided reflect the amounts paid by Ford.)

In producing these documents, I note that Ford's document retention policy generally does not extend beyond ten years. Thus, documents more than a decade old may no longer exist within the Company's files. Further, it is my understanding that the Company has not withheld any documents on confidentiality grounds.

Observations on lawsuits and claims

Over the past two weeks, it has been suggested during congressional hearings and elsewhere that over the past ten years, Ford has been the subject of hundreds of lawsuits alleging Explorer vehicle accidents involving Firestone tire tread separation and that through those lawsuits, Ford long ago obtained notice that its vehicles contained defective tires. At least as to Ford, these suggestions are incorrect.

The real story about lawsuits against Ford alleging Firestone ATX tire tread separation over the ten-year history of the Explorer vehicle is as follows:

- During 1991 (when the Explorer was introduced), there were ***no*** such lawsuits.
- During 1992, there was ***one*** such lawsuit.[1]
- During 1993, there were ***no*** such lawsuits.
- During 1994, there was ***one*** such lawsuit.[2]
- During 1995, ***three*** such lawsuits were filed.
- During 1996, there were ***no*** such lawsuits.
- During 1997, ***two*** such lawsuits were filed.
- During 1998, ***nine*** such lawsuits were filed.

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[1] During 1992, one lawsuit was filed alleging that an Explorer rollover accident was attributable in part to a tire failure. However, the police report on that accident indicated that the tire failure involved a sidewall puncture, not tread separation.

[2] In 1994, one lawsuit was filed alleging that an Explorer rollover accident was attributable in part to a tire failure. However, the plaintiff could not produce the tire in that case, and the tire-related claims were dropped from the action.

- During 1999, ***eight*** such lawsuits were filed.[3]

And over this period, Ford received only ***one*** lawsuit alleging Firestone Wilderness tire tread separation (during 1999).

No matter how you look at it, Ford was ***not*** being deluged with tire tread separation lawsuits. Without question, tire-related lawsuits can arise out of truly tragic events. But their numbers must be assessed in proper context. Tread separation incidents can and do occur (albeit infrequently) in all brands and models of tires. When those incidents do occur, they can have very serious consequences. Such incidents are often the result of issues peculiar to the particular failed tire or to factors external to the tire. Notwithstanding the persistent efforts of the tire industry to improve the reliability of their products, not all tires are perfect. But those occasional tire failures cannot – and should not – be deemed signals of systemic problems in a larger tire population. Thus, Ford's receipt of these lawsuits over a nine-year period alleging several tire failures in a population of over 3 million Explorer vehicles (particularly as the tires on those vehicles become older) is consistent with commonsense expectations and, without more, cannot be a basis for inferring that Ford knew of any widespread tire defects.

As Ford representatives have testified before Congress over the past two weeks, Ford was proactive and diligent in examining data from a variety of sources in an effort to assess the safety of the tires that Firestone ultimately recalled. Notwithstanding assurances from Firestone that the tires at issue were safe, Ford repeatedly demanded additional testing and data from Firestone. When Ford finally gained access to Firestone's claims data in late July, the pattern of failures became clear, and Ford insisted that Firestone conduct a recall (as it announced on August 9). As Ford's President and Chief Executive Officer, Jac Nasser, testified to the Senate Committee on Commerce last week, the Company was deeply troubled to learn that documents uncovered by your Subcommittees indicate that an internal Firestone analysis of those data performed at least two years earlier had already revealed to Firestone personnel the same pattern of failures recognized in Ford's analysis that ultimately triggered Firestone's recall.

With respect to the settlements of lawsuits against Ford, I also wish to emphasize that there were ***no*** "gag orders" that prevented the plaintiffs or their attorneys from discussing publicly the facts of the case or from reporting the specifics of their experiences to any government agency. Ford's Explorer-related documents and information are widely shared among plaintiffs' counsel. There are no secrets about the documents or the information contained therein. In fact, as you will see in the settlement agreements that we are producing, there is only one lawsuit in which the lawyers mutually agreed that documents would be returned at the conclusion of the proceedings, and even in that case, there was no "gag order" precluding anyone from discussing any aspect of the case. In general, the only items that Ford seeks to protect are (1) trade secrets (*e.g.*, future product plans, financial performance information) and

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[3] It should be noted that some of the lawsuits listed here resulted in either a jury verdict or summary judgment in Ford's favor and thus could not have indicated a defect. As reflected in the materials we are providing, numerous lawsuits alleging tread separation events were filed during calendar year 2000 once the tire issue became heavily publicized.

(2) the dollar amount of the settlements. Protecting the latter category of information is common practice and is widely viewed as appropriate. *See, e.g.*, Arthur R. Miller, *Confidentiality, Protective Orders, and Public Access to the Courts*, 105 HARV. L. REV. 427, 485 (1991); Miller, *Private Lives or Public Access*, 77 A.B.A.J. 64, 66 (Aug. 1991) ("the settlement process would be impaired if the parties could not rely on the assurances of confidentiality"); *Annual Judicial Conference, Second Judicial Circuit of the United States*, 101 F.R.D. 161, 233 (1983) (comments of Dean Edward A. Dauer) ("[t]here are legitimate, good faith reasons for the parties who are trying to work out a [settlement] . . . to be private"); Society of Professionals In Dispute Resolution, ETHICAL STANDARDS OF PROFESSIONAL RESPONSIBILITY § 3 (1986) ("[m]aintaining confidentiality [of settlement amounts] is critical to the dispute resolution process").[4]

* * *

We hope that these documents will aid the Committee's analysis. As I noted previously, Ford stands ready to respond to any questions that you or your staff may have about the materials that the Company has provided.

Sincerely,

Arthur B. Culvahouse, Jr.
of O'MELVENY & MYERS LLP

cc: Hon. Edward J. Markey
Ranking Minority Member, Telecommunications,
Trade and Consumer Protection Subcommittee
House Committee on Commerce

Hon. Ron Klink
Ranking Minority Member, Oversight and Investigations
Subcommittee
House Committee on Commerce

Members of the House Committee on Commerce

Hon. John McCain
Chairman, Senate Committee on Commerce,
Science, and Transportation

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[4] For these reasons, we respectfully urge the Committee to take account of the privacy interests of the individuals involved in the settlements agreements that are being produced.

Hon. Ernest F. Hollings
Ranking Minority Member, Senate Committee on Commerce,
Science, and Transportation

Hon. Richard C. Shelby
Chairman, Transportation Subcommittee
Senate Committee on Appropriations

Hon. Frank R. Lautenberg
Ranking Minority Member, Transportation Subcommittee
Senate Committee on Appropriations

Members of the Transportation Subcommittee,
Senate Committee on Appropriations

Dr. Sue Bailey
Administrator, National Highway Traffic Safety Administration

Mark Paoletta, Esq.
Chief Counsel for Oversight and Investigations
House Committee on Commerce

Reid P.F. Stuntz, Esq.
Minority Staff Director/Chief Counsel
House Committee on Commerce

Ford Motor Company

September 15, 2000

VIA HAND DELIVERY

The Honorable William Tauzin
Chairman, Subcommittee on Telecommunications,
Trade and Consumer Protection
Committee on Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, D.C. 20515-6115

The Honorable Fred Upton
Chairman, Subcommittee on Oversight and Investigations
Committee on Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, D.C. 20515-6115

RE: **Firestone Inquiries**

Dear Chairmen Tauzin and Upton:

Please accept this letter as Ford Motor Company's ("Ford") response to the requests from the Subcommittee on Oversight and Investigations and the Subcommittee on Telecommunications, Trade and Consumer Protection ("Subcommittees") for additional documents pertaining to the recall of 6.5 million tires by Bridgestone/Firestone, Inc. ("Firestone"). On Tuesday of this week, the Subcommittees notified Ford that it must provide the requested documents by today. In order to satisfy this request on such short notice, Ford has devoted significant resources to identifying and collecting responsive documents. Despite the short time period, we believe that this production is quite extensive. Ford will, of course, supplement these materials with additional responsive documents if, and when, they are identified.

The documents, video tapes and diskettes that accompany this letter are responsive to the Subcommittees' requests for the following two categories of information: first, documents relevant to the testing of the Firestone ATX, ATXII and Wilderness AT brand tires that are subject to the recall; and second, documents relevant to the decision to recommend inflation of the tires on the Ford Explorer to 26 pounds per square inch, including any documents discussing the relationship (if any) between the inflation of the tires and the handling and stability of the Explorer.

We should point out that most of these documents are already in your possession and have been since August 25, 2000, when Ford provided your staff six CDs containing over 60,000 pages of documents. Those CDs contain what Ford calls the "Explorer Collection" and many of the documents that are being provided today were culled from that collection. Since your staff first contacted Ford just over three weeks ago, we have provided over 100,000 pages of material in electronic form or hard copy to the Subcommittees. Ford has been pleased to assist the Subcommittees, and we will continue to do so.

As will be evident from a review of these documents, Ford has conducted an extensive and thorough testing program for the Firestone tires used as original equipment on several models of sport utility vehicles and light trucks, including the Explorer. For instance, Ford has conducted high speed tests, roll off tests (measures tire bead retention to wheel), heavy load durability tests, edge wear tests as well as dry and wet traction testing. Ford also has required Firestone -- as the supplier -- to conduct rigorous testing of the tires. Ford has included documents memorializing the various tests on Firestone and Goodyear tires that have been used as original equipment on Explorers, F-150 trucks, and other Ford vehicles.

We would like to address one of the specific tests discussed extensively during the hearing on September 6, 2000. At the hearing, Chairman Tauzin asked whether the Firestone ATX, ATXII, and Wilderness AT brand tires were subjected to high speed testing at the recommended inflation pressure of 26 pounds per square inch. As the accompanying materials demonstrate, Ford conducted high speed tests of the Firestone tires while they were inflated to an air pressure of 26 pounds per square inch.

Ford also has included an affidavit provided by James D. Avouris on September 11, 2000. Mr. Avouris is a former employee who -- for the 1991 through 1994 model years -- conducted design and development testing for Ford, including the testing of the tires, wheels and vehicle system for the UN46 Explorer program. Mr. Avouris states in the affidavit that he tested the performance of the Firestone P235/75R15 and the P225/70R15 AS tires. He also testifies that, in 1989, he conducted several "Tire High Speed Durability" tests on those tires at the Arizona Proving Grounds. Mr. Avouris attests that the Firestone tires were tested

> by running the vehicle for 200 miles at a minimum of 90 mph at ambient temperatures in the range of 90 degrees Fahrenheit. The acceptance criteria for the test requires that the tire vehicle system must achieve a minimum of 100 miles at that speed and temperature. The Tire High Speed Durability tests run on the UN46 Explorer were conducted at the maximum rear gross axle weight rating (GAWR) with the tire pressure for both the front and the rear set at 26 p.s.i.

Ford has provided this affidavit because we have not been able to locate the high speed testing documents for the ATX tire, which was approved for production for the 1991 model year Explorer. Given that those testing documents would have been created more than ten years ago, Ford believes that those documents may no longer exist, but we are continuing to look for them. The testimony of Mr. Avouris, however, demonstrates conclusively that Ford conducted high speed testing of the P235/75R15 ATX All Terrain tire at the specified air pressure of 26 pounds per square inch on all four tires.

Ford also conducted further high speed tests in 1994, when Firestone introduced the ATXII tire as original equipment on certain Ford vehicles. The accompanying documents show that Ford tested the P235/75R15 ATXII tires at 26 pounds per square inch of air pressure on all four tires for 200 miles at 95 mph (EXPV 0723-24). When Ford introduced the Goodyear Wrangler tire as original equipment on Ford Explorers in the 1995 model year, it again conducted high speed testing of the Goodyear P235/75R15 tires. The high speed testing records are included with this production to the Subcommittees, and they clearly show that Ford subjected the Goodyear Wrangler tires to high speed tests (200 miles at 96 mph) with all four tires inflated to 26 pounds per square inch (EXPA 1583-85). Then, in 1996, Firestone began manufacturing the P235/75R15 size of the Wilderness AT tire. Ford has included within this production the high speed testing records for the Wilderness AT tire, which show that this testing was required by our Design Verification Plan and Report (DVP&R) (BAAE 3286-3289). We are still attempting to locate the actual test records from 1996. However, Ford believes that this evidence should resolve any questions as to whether the Firestone tires were tested at high speeds and at the specified inflation pressure of 26 pounds per square inch.

These documents also demonstrate that Ford selected a recommended air pressure for the P235/75R15 tires that was well within the range approved by the Tire and Rim Association. For a vehicle of the Explorer's size and maximum load capacity, the Tire and Rim Association sets a range of air pressures for the P235/75R15 tire of 20 to 35 pounds per square inch. Moreover, as you know, Firestone approved the performance specifications for these tires, which clearly required an inflation level of 26 pounds per square inch. Included is the certification Ford obtained from Firestone reflecting successful completion of heavy load durability testing at 26 pounds per square inch (EXP7 1844). Tires were run at 50 mph for 130 hours at 26 pounds per square inch with progressively heavier loads, reaching 150% of maximum tire loading (at 26 pounds per square inch).

The documents accompanying this letter further establish that the Explorer prototype, or UN46, passed the required handling and stability tests conducted before it went into full production for the 1991 model year. For instance, these documents show that, on January 3, 1990, Ford obtained confirmation that the Explorer passed the J-Turn maneuver on the ADAMS test -- a test conducted to measure rollover resistance -- when equipped with P235/75R15 ATX All Terrain tires (EXPT 0515-45). The tires were inflated to 26 pounds per square inch (EXPT 0518, EXPT 0521). The one tire that did not pass the J-Turn maneuver was the high performance P225/70R15 tire, a tire that was never used on the Explorer. In addition, Ford engineers have repeatedly certified that the Explorer complied with resistance to rollover guidelines (EXP4 1627, EXPA 1698-99).

In reviewing testing records, it is important to note the design level of the vehicle being tested. While there are documents included in this production that reflect tests of early design levels that were conducted during the development of the Explorer, it is the design level that went into production that is relevant. The production level design of the UN46/Explorer passed the requisite handling and stability tests using the P235/75R15 tire inflated to an air pressure of 26 pounds per square inch (EXPT 0515-45).

Given the highly complex and technical nature of the engineering analysis reflected in many of these documents, Ford is more than willing to assist the Subcommittees as they attempt to make sense of this testing data. Please contact our representatives in Washington, D.C. if you would like assistance with these materials.

Very truly yours,

Helen Petrauskas

Thomas Baughman

cc: Hon. Edward J. Markey
Ranking Minority Member, Telecommunications,
Trade and Consumer Protection Subcommittee
House Committee on Commerce

Hon. Ron Klink
Ranking Minority Member, Oversight and Investigations
Subcommittee
House Committee on Commerce

Members of the House Committee on Commerce

Hon. John McCain
Chairman, Senate Committee on Commerce,
Science and Transportation

Hon. Ernest F. Hollings
Ranking Minority Member, Senate Committee on Commerce,
Science and Transportation

Hon. Richard C. Shelby
Chairman, Transportation Subcommittee
Senate Committee on Appropriations

Hon. Frank R. Lautenberg
Ranking Minority Member, Transportation Subcommittee
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Dr. Sue Bailey
Administrator, National Highway Traffic Safety Administration

Mark Paoletta, Esq.
Chief Counsel for Oversight and Investigations
House Committee on Commerce

Reid P. F. Stuntz, Esq.
Minority Staff Director/Chief Counsel
House Committee on Commerce

Attachment 2

LIGHT TRUCK ENGINEERING
DESIGN VERIFICATION PLAN AND REPORT (DVP & R)

Design Level Key
MP-Mechanical Proto.
EP-Engineering Proto.

Risk Assessment Key
5-No Risk
4-Minor Risk
3-Major (Minor Job #1) Risk
2-Major (Major Job #1) Risk
1-Not Approved
NE-Not Evaluated or Incomplete
NR-Not Required
J-Judgement

PROGRAM:
ACTIVITY:
PREPARER:
APPROVAL:

Issue Date:
Revised:
Revised:
Revised:
Revised:
Revised:
Revised:
Revised:
Revised:

		Reference Number.		Vehicle		Test	Test	Completion Date		Percent Complete		Risk	
CPSC	System/Component	Responsibility	Description	Level	Report No	Samples	Time	Scheduled	Actual	Scheduled	Actual	Assessment	Remarks
4 04	Casing - Tire (1508)		A) PLATFORM SUPPORT-PROGRAM APPROVAL										
		Ford	-Preliminary data gathering to support Platform decision process.			NA		36 Months					-Marketing information from supply base -Prelimary tire envelope and vehicle package requirements -Prelimary performance characteristics (traction, R/R, wear, ride & handling) -Prelimary cost and weight information.
		Ford	-Provide support for product reviews.			8		29 Months					-Provide tires for design center reviews -Support platform reviews at DPG.
		Ford	-Program Direction Letter Approval.			NA		30 Months					
		Ford	-Issue program assumptions.			NA		29 Months					-Requires cost and weight target.
		Ford	-Issue tire targets to suppliers.			NA		24 Months					-Targets include the performance targets and timing dates for each development characteristics.
			B) TIRE DEMENSIONS, VEHICLE DESIGN CRITERIA.										
		DO 4 04-369 Ford	-Tire dimension composites.			NA		20 Months					-Tire & tire/wheel master mylars for clearance conditions relative to maximum tire dimensions.
		DM 0 00-416 Ford	-Determine vehicle design criteria.			NA		29 Months					-Vehicle package criteria relative to sheetmetal and suspension component clearances. Design standards for modified jounce, full jounce, and rebound positions at design load and curb conditions.
		Tire ES 100 Ford	-Tire RPM specifications.			NA		24 Months					-L. T. Tire Design issues targets in conjuction with speedometer/odometer personel. Targeted mean RPM values and 3 sigma range values are required.
			C) SAFETY COMPLIANCE										
		Supplier	-Supplier must meet government requirements per FMVSS 100, 119, & 120 (supplier DOT standards).			NA		6 Months (Annual)					-Requires Supplier sign-off letters, composite/construction forms must be provided to certify compliance

SPEC	System/Component	Reference Number, Responsibility	Description	Vehicle Level	Report No	Test Samples	Test Time	Completion Date		Percent Complete		Risk Assessment	Remarks
								Scheduled	Actual	Scheduled	Actual		
			D) TIRE STYLING										
		Ford	-Design Center approval required for for all new tire designs.			4		20 Months					-Approval required relative to tread pattern, sidewall design, and outline white letter styling
		GPAS GEN T- 4 04-IV-D-1 Ford	-GPAS Tire Appearance			1		ISIR					-Uniform color density, WSW & OWL lettering must be concentric and of constant width.
			E) ENGINEERING SPECIFICATIONS-LAB TESTING										
		Rolling Resistance ES EOTA-1508-BA Ford/Supplier	-Rolling Resistance/Skid Depth/Weight	Lab Test		3		17 Months					-Evaluate all tire submissions at Bldg 4 test lab for conformance to targets established by L.T. Tire Design, both 67 inch Drum and 9 inch Twin Roll are evaluated for Rolling Resistance. Submissions should include test data from supplier's machines correlated to the Ford machine.
		Tire ES ES-F4TA-1508- Ford/Supplier	-Force and Moment Tire Testing	Flat Trak		5		24-12 Months					Test conducted to acquire dynamic tire data for analysis with the ADAMS vehicle modeling program.
			F) ENGINEERING SPEC.-VEHICLE TESTING										
		Ford/Supplier	-Vehicle Sensitivity Study	MP		15		20 Months					-Determine vibration acceptability of production capable tire/wheel assemblies.
		GPAS GEN-T 4 00-IV-B2 Ford	-Jounce Study	MP		4		20 Months					-Statically and Dynamically jounce the suspension to determine tire/wheel clearance to sheetmental & suspension components. Clearance must comply with DM 0 00-418 standard
		Tire ES ES-F4TA-1508-	Dry Traction (Ford) Wet Traction (Supplier)	Skid Trailer		18		18 Months					-Minimum dry traction integrals and wet traction peak/slide values are set by L.T. Tire Design. Each submission is run against a known control tire, picked by L.T. Tire Design, to eliminate track and weather variation.
		Tire ES ES-F4TA-1508- Ford	-Ride & Handling, Noise, Grove Wander	MP/EP		12		15 Months					-Tires evaluated at curb and max. vehicle test load, and at appropriate pressure. Each vehicle application is tested and subject tires must meet or exceed a minimum rating of 6 in all areas. Minimum acceptable rating can be raised above 6 by L.T. Tire Design if necessary
		Tire ES ES-F4TA-1508- Ford	-High Speed Performance	Slave Vehicle (APG)		4		12 Months					-Test for 200 miles of high speed at 70-90 degrees ambient temperature per P3-81A procedure. No loss of function or defect is allowed. Break in period is required

CPSC	System/Component	Reference Number, Responsibility	Description	Vehicle Level	Report No.	Test Samples	Test Time	Completion Date Scheduled	Completion Date Actual	Percent Complete Scheduled	Percent Complete Actual	Risk Assessment	Remarks
		Tire ES ES-F4TA-1508- Ford	-Roll Off Test	Slave Vehicle (APG)		2		12 Months					-Subject mounted tires to max. side thrust maneuver at max. load, repeat 25 times. Tires must remain on wheels with no loss of air pressure.
		Tire ES ES-F4TA-1508- Ford	-Tire Retention Test	Slave Vehicle (APG)		1		12 Months					-ST-8 procedure. Subject mounted tire and wheel assemblies to straight away blow out test by running across test track spike. During controlled stop each tire must remain between inside and outside rim flanges, rapid air loss must be confirmed
		Tire ES ES-F4TA-1508- Supplier	-Edge Wear Tire Testing	MP/EP		4 - New 4 - Control							-Edge wear test can be conducted at any approved test facility, per LT-ES procedure. Tires are run against a control tire chosen on the basis of experience by LT Eng. and are evaluated subjectively and objectively against the control tire. Two vehicles are run concurrently.
		Tire ES ES-F4TA-1508- Supplier	-Irregular Wear Tire Testing (10,000 mile)	MP/EP		4-new 4 - control		12 Months					-Irregular wear test can be conducted at any approved test facility, per LT-ES procedure. Tires are run against a control tire chosen on the basis of experience by LT Eng. and are evaluated subjectively and objectively against the control tire. Two vehicles are run concurrently.
		Tire ES ES-F4TA-1508- Supplier	-Gravel Road Hazard Test (1,000 miles)	Slave Vehicle		4-new 4-control		12 Months					-Gravel Hazard test can be conducted at any approved test facility, per LT-ES procedure. Tires are run against a control tire chosen on the basis of experience by LT Eng. New tires must not exhibit greater deterioration than the control tire. Two vehicles are run concurrently.
		Tire ES ES-F4TA-1508- Supplier	-Heavy Load Lab Durability	Lab		2		12 Months					-Heavy Load Durability will be conducted at the tire suppliers test lab per - DOT-109 & 119 test procedure at LT-Eng ES specified loads and duration, 2 tires must complete test without failure.
			G) IN PLANT TESTING										
		Tire ES ES-F4TA-1508- Ford/Supplier	-Tire and Wheel Mounting Trial	EP		10		10 Months					-Assure that tires and wheels can be mounted using in plant equipment. This includes mounting, matching, inflating, balancing, and auditing.
			-Vehicle Toe Set Trial	EP		12		2 Months					-Each tire on each vehicle application is checked out with the toe set equipment

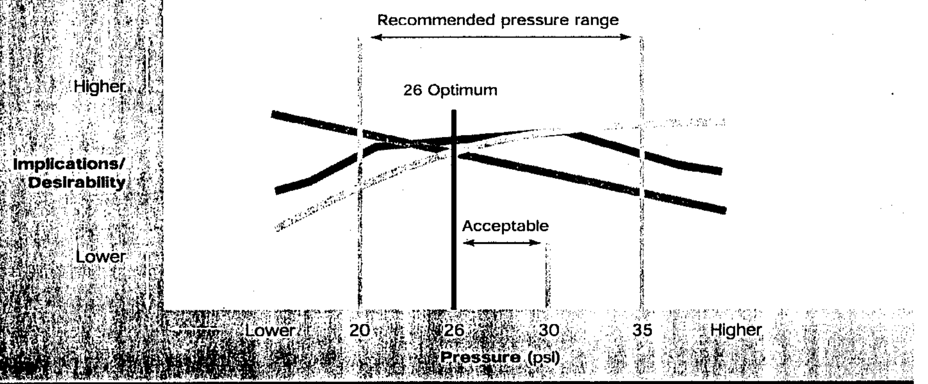
		Reference Number.		Vehicle		Test	Test	Completion Date		Percent Complete		Risk	
CPSC	System/Component	Responsibility	Description	Level	Report No.	Samples	Time	Scheduled	Actual	Scheduled	Actual	Assessment	Remarks
													to determine bias of alignment settings
													prior to job #1 date.
			1) QUALITY SPECIFICATIONS										
		Supplier	-ISIR	EP		300		6 Months					-ISIR is handled by the supplier and SQA
													it requires a signed off construction
													sheet from LT-Eng.
		Supplier	-Uniformity Data Checks			Statistical		Quarterly					-Uniformity Data supplied to Engineering
						Sample							for analysis.
		Supplier	-Rolling Resistance Checks			3		Quarterly					-Data supplied to Engineering to assure
													EPA coastdown quick checks will pass.

Attachment 3

Vehicle tire parameters - P235/75R15

Tire and Rim Association

- ▨ High speed durability, load carrying capacity, fuel economy, and bead seat on rim
- ■ Ride, comfort, noise, vibration and harshness
- ■ Stability and handling



Attachment 4

SAFETY DESIGN GUIDELINES for New Vehicles

Approved February 26, 1999

Purpose:
Safety Design Guidelines are intended to enhance the already extensive Company efforts to provide vehicles that exhibit a high level of safety. These Guidelines are not, and cannot be, all inclusive. Safety improvements have been, and will continue to be, made in areas beyond the scope of these Guidelines. These Guidelines are in addition to regulatory requirements and are contained in the WISE database (Worldwide Integrated Standards for Engineering) under the heading "Non-Regulatory," accessible through the Ford Web.

Application:
Markets: The Core Safety Content guideline applies to vehicles offered for sale in any market, regardless of design or manufacturing source. All other guidelines apply to vehicles offered for sale in Australia, Europe, or U.S./Canada, regardless of design or manufacturing source. Where Core Safety Content requirements overlap with other Safety Design Guideline requirements, the other Safety Design Guideline requirements take precedence.
Vehicles: Passenger cars, light trucks, and commercial trucks (reference "Vehicle Definitions" below).
Segments: All vehicle segments
Fuel: Vehicles fueled by liquid fuel (boiling point above 0°C [32°F]), compressed natural gas (CNG), liquefied petroleum gas (LPG) or any combination.

Vehicle Definitions (as used in this document):
Passenger cars – Includes vehicles defined as passenger cars in FMVSS and also includes categories M1 in Europe and MA/MB/MC in Australia (generally, all vehicles, excluding "goods vehicles," capable of carrying nine occupants or less). Certain vehicles classified as light truck and MPVs in the U.S. market are classified as passenger car (M1 or MA/MB/MC) in the European or Australian markets and as such are subject to passenger car Guidelines in those markets.
Light Trucks – MPVs and vehicles other than passenger cars, up to 3.85t GVM (8500lb.GVWR).
Commercial Trucks – Vehicles over 3.85t GVM (8,500lb.GVWR) in the U.S/Canada. Includes categories N1/N2/N3/M2/M3 in Europe (generally, all "goods vehicles" and vehicles "capable of carrying more than nine occupants). Includes categories MD/ME/NA/NB in Australia (generally, all "Omnibus" and "Goods" vehicles). Stripped chassis vehicles are not included, unless noted.

Date Definitions:
Implementation Date: Applies to new guidelines and to revised guidelines; implementation should be as soon as possible, but no later than the date specified, for all applicable vehicles.
Implementation Date for Grandfathered Programs: Applies to previously-approved guidelines for which not all vehicles are yet in compliance; implementation should be no later than the date specified.
No Implementation Date Shown: Applies to previously-approved guidelines currently in effect.

References: All references to the Ford Acceptance Criteria (FAC) in these Guidelines refer to the criteria in effect at the date of issue of the Guidelines to which they relate. FAC are contained in WISE.

Review: These Guidelines must be reviewed for applicability against each new vehicle program. As described in FAP03-196, Deviation and Compliance Policy for Standards and Specifications, proposed exceptions to these Guidelines due to business or other strategic reasons and Guidelines which the Program had intended to meet but was unable to due to feasibility, timing, and or other capability issues must be reviewed by the Safety Matters Meeting and the PP&T (Product Planning & Technology Committee). Safety Design Guideline status reporting is a requirement of Engineering Sign-Off documentation.

SAFETY DESIGN GUIDELINES for New Vehicles

Approved February 26, 1999

OCCUPANT RESTRAINTS

- **3-Point Lap/Shoulder Belts – Australian, European, U.S./Canadian Markets**
  - ◊ Provide 3-Point one-piece non-detachable continuous loop lap/shoulder belts in all outboard forward-facing seating positions for all vehicles.
  - ◊ Provide 3-Point one-piece non-detachable continuous loop lap/shoulder belts in all forward-facing rear center seating positions in all vehicles under 4.5t GVM (10,000lbs. GVWR).
  - ◊ Provide 3-Point one-piece non-detachable continuous loop lap/shoulder belts in the front center seating position, if such position exists, in all vehicles under 4.5t GVM (10,000lbs. GVWR) without forward facing rear seats.
- **Air Bags – Australian, European, U.S./Canadian Markets**
  - ◊ Provide for the availability of driver and front outboard passenger air bags for passenger cars and light trucks.
  - ◊ For vehicles equipped with frontal air bag(s), meet or surpass the dummy head, neck, and chest provisional reference numbers per FAC under the following configurations:

    Static Air Bag Inflation
    - ◆ Out-of-Position Driver: Small Female dummy with nose on steering wheel rim
    - ◆ Out-of-Position Driver: Small Female dummy with chest on steering wheel hub
    - ◆ Out-of-Position Passenger: 6-Year old dummy seated upright in passenger seat 4 inches from instrument panel
    - ◆ Out-of-Position Passenger: Small Female dummy seated in the passenger seat with head on the instrument panel

    Hyge Sled Vehicle Acceleration
    - ◆ Belted Driver and Passenger: Small Female dummy seated in a full forward and upright position with a sled pulse curve per FMVSS 208, S13.4, Figure 6.

Implementation Date for Grandfathered Programs: 2003 MY

FULL FRONTAL IMPACT

Australian, European, U.S./Canadian Markets

- For vehicles under 3.85t GVM (8,500lb GVWR), the following requirements are to be met in a perpendicular impact into a fixed barrier at 56.4km/h (35mph):
  - ◊ Meet or surpass the crash test performance criteria of:
    - ◆ European and U.S./Canadian Markets
      FMVSS 208 (Occupant Crash Protection), per FAC, using belted Hybrid III dummies
      Australian Market
      ADR 69 (Full Frontal Impact Occupant Protection), per FAC, using belted Hybrid III dummies
    - ◆ FMVSS 212 (Windshield Mounting)
    - ◆ FMVSS 219 (Windshield Zone Intrusion)
    - ◆ FMVSS 301 (Fuel System Integrity), per FAC
    - ◆ FMVSS 303 (Fuel System Integrity for CNG vehicles), per FAC
    - ◆ CMVSS 301.1 (LPG Fuel System Integrity) fuel leakage and pressure drop requirements only, per FAC
    - ◆ Appropriate combination of FMVSS 301, FMVSS 303 or CMVSS 301.1 for dual fuel vehicles
  - ◊ All interior compartment doors to remain closed during the impact sequence.
  - ◊ Side doors, hatches, and liftgates to remain closed during the impact sequence.
  - ◊ Seats or seat backs designed to move for occupant egress to remain operable post impact.
  - ◊ All side doors to be openable post impact without tools.

SAFETY DESIGN GUIDELINES for New Vehicles

Approved February 26, 1999

OFFSET FRONTAL IMPACT

Australian, European, U.S./Canadian Markets – Passenger Cars & Light Trucks under 2.5t GVM (5500lb. GVWR)

The following requirements are to be met in a perpendicular impact into a fixed deformable barrier as defined by UN-ECE Regulation 94.01 protocol with impact at a 40% overlap on the driver side and with two belted Hybrid III dummies in the front outboard seats.

- OPTION: *Either* meet or surpass the Front Impact performance requirements of ECE-94.01 at 60km/h (37.5mph) using the Ford internal statistical acceptance criteria per FAC, *OR* meet or surpass the Front Impact performance requirements of ECE-94.01 at 64km/h(40mph) with regulatory criteria as acceptance criteria.
- Meet or surpass the crash test performance criteria of:
  - ◊ FMVSS 212 (Windshield Mounting)
  - ◊ FMVSS 219 (Windshield Zone Intrusion)
  - ◊ FMVSS 301 (Fuel System Integrity), per FAC
  - ◊ FMVSS 303 (Fuel System Integrity for CNG vehicles), per FAC
  - ◊ CMVSS 301.1 (LPG Fuel System Integrity) fuel leakage and pressure drop requirements only, per FAC
  - ◊ Appropriate combination of FMVSS 301, FMVSS 303 or CMVSS 301.1 for dual fuel vehicles
- Side doors, hatches, and liftgates to remain closed during the impact sequence.
- All interior compartment doors to remain closed during the impact sequence.
- One door per seat row to be openable post-impact without tools.

Implementation Date for Grandfathered Programs: 2003 MY

INTERIOR SIDE IMPACT PROTECTION

Australian, European, U.S./Canadian Markets – Passenger Cars and Light Trucks

OPTION: Armrests on door and quarter trim panels adjacent to the driver-row and second-row seats shall meet *either* a) or b) or c):

a) When tested using the BIOSID test dummy in a component test at 6.7m/s (15mph), shall not exceed the delta-deflection provisional reference number of the FAC.
b) When tested using the BIOSID test dummy in the "arm up" configuration at 53.9km/h (33.5mph) in a full vehicle test per the dynamic test procedure of FMVSS 214 (Side Impact Protection), shall not exceed the abdominal rib deflection provisional reference number of the FAC.
c) When tested using the EUROSID-1 test dummy to UN-ECE Regulation 95.01 (Side Impact) at 50km/h (31mph) in a full vehicle test, shall meet or surpass the abdominal force compliance acceptance criterion of the FAC.

Implementation Date for Grandfathered Programs: 2003 MY

SAFETY DESIGN GUIDELINES for New Vehicles

Approved February 26, 1999

SIDE INTRUSION

Australian and European Markets – Passenger Cars and Light Trucks Derived From Passenger Cars
Meet or surpass the quasi-static crush requirements of FMVSS 214(Side Door Strength) per FAC.

DYNAMIC SIDE IMPACT

Australian, European, U.S./Canadian Markets
The following requirements, incremental to the Australian, European and U.S. regulations, are to be met or surpassed by vehicles that must comply with UN-ECE Regulation 95 or FMVSS 214(dynamic) when tested to the procedures noted below:

- All side doors, except those impacted, to be openable post impact without tools
- Side doors, hatches, and liftgates to remain closed during the impact sequence.
- Meet or surpass the crash test performance criteria of:
  - ◊ FMVSS 301 (Fuel System Integrity), per FAC
  - ◊ FMVSS 303 (Fuel System Integrity for CNG vehicles), per FAC
  - ◊ CMVSS 301.1 (LPG Fuel System Integrity) fuel leakage and pressure drop requirements only, per FAC
  - ◊ Appropriate combination of FMVSS 301, FMVSS 303 or CMVSS 301.1 for dual fuel vehicles
- Seats or seat backs on the non-impacted side which are designed to move for occupant egress to remain operable post impact.
- No interior aggressive edges to be presented post impact.

The above requirements are to be met using the following test procedures:

- European Market: UN-ECE Regulation 95.01 (50km/h [31mph]), for vehicles with H point-to-ground ≤ 700mm
- U.S./Canadian Market: FMVSS 214 (53.9km/h [33.5mph]), for vehicles with GVWR ≤ 6000lb
- Australian Market: ADR 72 (either ECE-95.01 or FMVSS 214)

REAR IMPACT

Australian, European, U.S./Canadian Markets – Passenger Cars and Light Trucks
The following requirements are to be met in a perpendicular impact with a moving barrier[1] at 56.4km/h (35mph):

- Meet or surpass the crash test performance criteria of:
  - ◊ FMVSS 301 (Fuel System Integrity), per FAC
  - ◊ FMVSS 303 (Fuel System Integrity for CNG vehicles), per FAC
  - ◊ CMVSS 301.1 (LPG Fuel System Integrity) fuel leakage and pressure drop requirements only, per FAC
  - ◊ Appropriate combination of FMVSS 301, FMVSS 303 or CMVSS 301.1 for dual fuel vehicles
- Side doors, hatches, and liftgates to remain closed during the impact sequence.
- All side doors to be openable post impact without tools.

[1] U.S./Canada: 1814kg (4000lb)
Europe / Australia: 1100kg (2425lb)

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FUEL SYSTEM PERFORMANCE DURING VEHICLE-TO-VEHICLE IMPACT

Australian, European, U.S./Canadian Markets – Passenger Cars and Light Trucks

Meet or surpass the following crash test requirements in a 80.6km/h (50mph) impact by a bullet vehicle[1] at the indicated target vehicle locations:

- FMVSS 301 (Fuel System Integrity), per FAC
- FMVSS 303 (Fuel System Integrity for CNG vehicles), per FAC
- CMVSS 301.1 (LPG Fuel System Integrity) fuel leakage and pressure drop requirements only, per FAC
- Appropriate combination of FMVSS 301, FMVSS 303 or CMVSS 301.1 for dual fuel vehicles

The above requirements are to be met at the following impact locations into the target vehicle per Engineering Test Procedure P4-90:

Passenger Cars and Light Trucks

- ◊ Rear impact on vehicle centerline *OR* rear impact with 50% overlap toward filler side, whichever is determined as the most severe point of impact for fuel system performance considering fuel filler and fuel tank locations.

Passenger Cars

- ◊ Side impact at the centerline of the fuel filler opening.

Light Trucks

- ◊ Side impact at the centerline of the fuel filler opening OR side impact forward of the fuel filler opening to clear the rear tire, whichever is determined as the most severe point of impact for fuel system performance considering fuel filler and fuel tank locations.

[1] U.S./Canada: OPTION: Ford Bullet Barrier at 1368kg (3015lb) or an equivalent vehicle at 1539kg(3392lb)
Europe /Australia: Escort or equivalent, at 1278kg(2817lb)

STEERING SYSTEM IMPACT

Australian, Canadian and European Markets – Passenger Cars and Light Trucks

OPTION: Either provide a driver air bag *OR* meet or surpass the body block impact criteria of UN-ECE Regulation 12.03 (Protection of the Driver Against the Steering Mechanism in the Event of Impact) at angles up to 15 degrees left and right of the vehicle centerline.

Australian, European, U.S./Canadian Markets – All Vehicles

Meet the following nominal design criteria:

- Minimum nominal steering wheel rim diameter of 25mm (1 in.)
- Minimum projected steering wheel hub area of $194 cm^2$ ($30 in^2$)

Meet the following requirement in a single Faceform / Steering Wheel rim impact test conducted per test procedure T657-307:

- Maximum force at the Maxilla shall not exceed 240 pounds (1068 N)

Implementation Date: As soon as possible, but no later than 2003 MY

SAFETY DESIGN GUIDELINES for New Vehicles

Approved February 26, 1999

FRONT OUTBOARD HEAD RESTRAINTS

Australian, European, U.S./Canadian Markets – All Vehicles

- Meet or surpass the following height dimensions:
    - For vertically adjustable head restraints, the parallel-to-torso-line dimension from the seating reference point to the top of the head restraint shall not be less than 750mm (29.5in) in the lowermost in-use position and 800mm (31.5in) in the uppermost in-use position.
    - For fixed head restraints, the parallel-to-torso line dimension shall meet the uppermost in-use position requirement of 800mm (31.5in).
    - Head restraint height dimensions less than specified above are allowable for front seats fitted with a tilt adjustment system for rear seat ingress, to the degree necessary to provide an adequate clearance, in any seat position, not exceeding 25mm (1 in) between the head restraint and the interior surface of the vehicle. In no case, shall the in-use dimension fall below 700mm (27.5 in)
- The head restraint/seat system shall meet or surpass Ford internal HIII criteria per FAC when loaded by a belted 50th % Hybrid III dummy in a rear impact Hyge sled test (or equivalent), with a ΔV of 16km/h (10mph), per CETP 01.20-L-811.
- Provide a locking latch mechanism for manually and vertically adjustable head restraints.

Implementation Date for Grandfathered Programs: 2003 MY

CARGO RETENTION

Australian and European Markets – Passenger Car and Light Trucks

- Seats and Partitioning Systems – For vehicles with more than one row of seats, the rear seat, or partition if provided, shall restrain an unrestrained load of 45 kg (2 x 22.5 kg)(100lb) placed 200mm (8in) behind the rear seat back. For vehicles equipped with a partitioning system which extends above the seat back, restrain an unrestrained load of 57.5 kg (127lb). The rear seats or partition shall meet or surpass the acceptance criteria per FAC under the following conditions (CETP to be included in WISE):
    - Subject to UN-ECE Regulation 44 pulse.
    - Each seating position with Seat Integrated Restraints (upper anchorage of the 3 point seat belt mounted to the seat structure) must meet the requirement when occupied by a 50th percentile male Hybrid III dummy in all such seating positions.
    - Seats with Integrated Child Restraints must meet these requirements when occupied by a dummy of the recommended maximum child weight for the seat as defined in UN-ECE Regulation 44.
- Tie Downs – For vehicles without fixed seat backs or a partition which meet the dynamic loading requirements above, provide tie down points which meet the strength requirements of Swedish Road Traffic Regulations (12.02), for all vehicles with sufficient cab space.

European Markets – Light Trucks

Partitioning Systems for Vehicles With One Row Of Seats – A full bulkhead meeting Swedish Road Traffic Regulations (12.02) strength requirements is to be provided as a delete option for all vehicles with sufficient cab space. For vehicles designed to allow "walk through" to the load compartment, the barrier width may be reduced, but should extend at least 500mm (19.7in) laterally from the driver's seating reference point.

Implementation Date for Grandfathered Programs: 2004 MY

SAFETY DESIGN GUIDELINES for New Vehicles

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RESISTANCE TO ROLLOVER

Australian, European, U.S./Canadian Markets – Light Trucks; Commercial Trucks with three (3) or more Designated Seating Positions
Vehicles shall have no simultaneous two wheel lift when evaluated to the CAE J-Turn Procedure (DRAFT CETP 00.00-R-xxx). In addition to the CAE J-Turn Procedure, perform the transitional stability and cornering response evaluations (CETP 00.00-R-205) and confirm acceptable vehicle performance per CETP 00.00-R-202.

Implementation Date for Light Trucks: As soon as possible, but no later than 2003MY
Implementation Date for Commercial Trucks: As soon as possible, but no later than 2005MY

ABS

Australian, European, U.S./Canadian Markets – Passenger Cars
Provide for the availability of an all-wheel antilock brake system (ABS).

US/Canadian Market -- Light and Commercial Truck < 4.5t GVM (10,000lb GVWR), including stripped chassis
Provide rear-wheel or all-wheel antilock brake systems.

Implementation Date for Grandfathered Programs: 2000 MY

ROOF CRUSH RESISTANCE

Australian and European Markets -- Passenger Cars and Light Trucks
Meet or surpass the requirements of FMVSS 216 (Roof Crush), per FAC.

U.S./Canadian Markets – Light Trucks
Meet or surpass the static roof crush requirements of FMVSS 216 (Roof Crush Resistance) at both the front and rear of the vehicle cab per FAC (conformance to be demonstrated on separate vehicles).

Implementation Date for Grandfathered Programs: 2004 MY

INTERIOR FITTINGS

Australian Market – Passenger Cars and Light Trucks
Meet or surpass UN-ECE Regulation 21 (Interior Fittings)

European Market – Light Trucks
Meet or surpass UN-ECE Regulation 21 (Interior Fittings)

FLAMMABILITY

Australian, European, and Jaguar Markets -- All Vehicles
Meet or surpass the requirements of FMVSS 302 (Flammability of Interior Materials).

Jaguar
Luggage and engine compartment trim and insulation materials to meet the FMVSS 302 burn rates.

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VISIBILITY

Australian, European, U.S./Canadian Markets – All Vehicles

Provide as standard equipment exterior driver and passenger side rear view mirrors and provide an interior rear view mirror, except for those vehicles with a bulkhead or without a backlight.

PEDESTRIAN PROTECTION

Australian Market – Passenger Cars and Light Trucks

- Provide externally fitted rear view mirror mountings which enable fore and aft deflection of the mirror, when subjected to forces typical of impact from a passing pedestrian, and which can be manually restored to prior settings.
- Provide for the objectives of the external projection requirements specified in UN-ECE Regulation 26.02.

Australian and European Markets – Passenger Cars and Light Trucks

The form and stiffness characteristics of front end designs should avoid unduly aggravating the injury potential to pedestrians in areas such as the front bumper, aerials, and the leading edge and top surface of the hood/bonnet, and the projection of components such as wipers and aerials into potential pedestrian impact areas should be minimized.

U.S./Canadian Markets

Passenger Cars

Design to conform to the apparent objectives of the external projection requirements specified in EEC Directive 74/483 as amended by EEC Directive 79/488.

Light Trucks

Design to conform to the apparent objectives of the external projection requirements specified in UN-ECE Regulation 61, "Exterior Projections of Commercial Vehicles."

BRAKE-SHIFT INTERLOCK

U.S./Canadian Markets – Vehicles under 8.7t GVM (20,000 lb GVWR)

Provide brake pedal-automatic transmission shift control interlock.

VEHICLE INGRESS/EGRESS

Australian, European, U.S./Canadian Markets – Commercial Trucks over 8.7t GVM (20,000 lb GVWR)

Meet or surpass the requirements of cab-over engine vehicle FHWA ingress/egress regulatory requirement, Code of Federal Regulation (CFR) 49, paragraph 399.207.

CLUTCH PEDAL / STARTER INTERLOCK

U.S./Canadian Markets – Commercial Trucks over 3.85t GVM (8,500 lb GVWR)

Provide a clutch pedal/starter interlock for vehicles equipped with a manual transmission. Interlock to prevent starter engagement unless the clutch pedal is depressed.

SAFETY DESIGN GUIDELINES for New Vehicles

Approved February 26, 1999

CORE SAFETY CONTENT

All Worldwide Markets – All Vehicles

The following are the minimum product features and performance attributes for all markets. Proposed exceptions based on specific national government policy or local market conditions must follow Procedure FAP03-196.

Product Features:

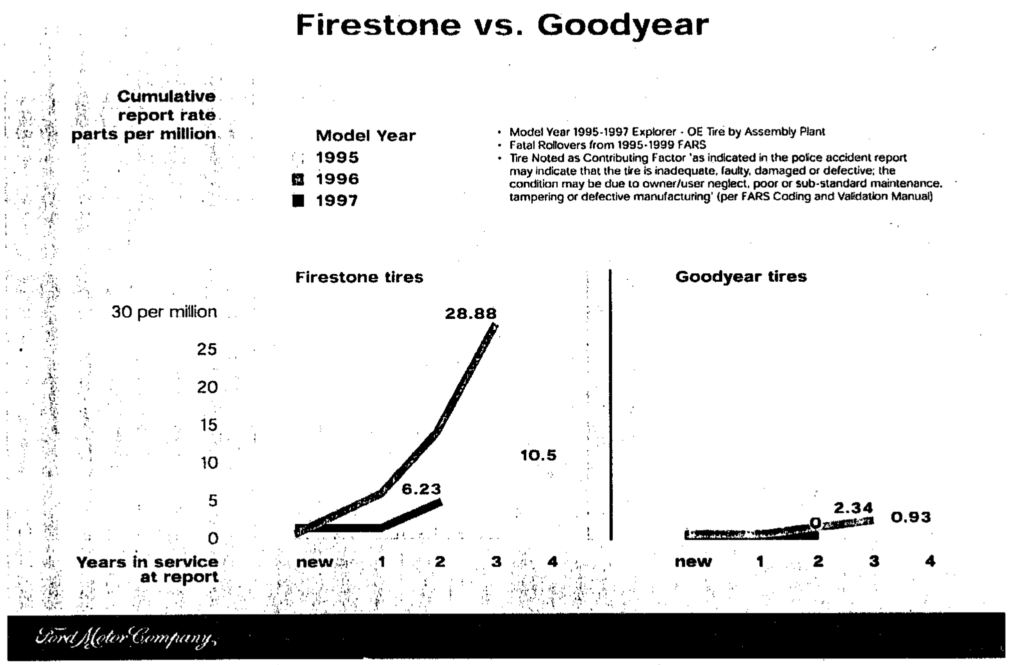
- 3-point lap/shoulder belt in all outboard seating positions
- Lap belt in all other seating positions
- High penetration resistant windshield
- Energy absorbing steering column
- Driver outside rearview mirror
- Head restraints in front outboard seating positions

Performance Attributes:

- Interior materials with burn resistance characteristics essentially equivalent to FMVSS 302
- For all vehicles up to 3.85t GVM (8,500lb. GVWR), vehicle structure and restraints to be designed to the following crash tests and performance requirements using test protocols of referenced requirements:
    - Frontal Perpendicular Barrier Impact:
        - Injury criteria for belted front seat occupants essentially equivalent to FMVSS 208 or ECE 94
        - Steering column displacement essentially equivalent to FMVSS 204 or ECE12
        - Windshield retention essentially equivalent to FMVSS 219
        - Windshield zone intrusion essentially equivalent to FMVSS 219
        - Fuel system integrity essentially equivalent to FMVSS 301 or ECE 34
    - Rear Moving Barrier (or Pendulum) Impact:
        - Fuel system integrity essentially equivalent to FMVSS 301 or ECE 34
        - Passenger compartment displacement essentially equivalent to ECE 32

Implementation Date: Immediately for all requirements except the injury criteria for belted front seat occupants which should be implemented as soon as possible but no later than 2003MY.

Attachment 5



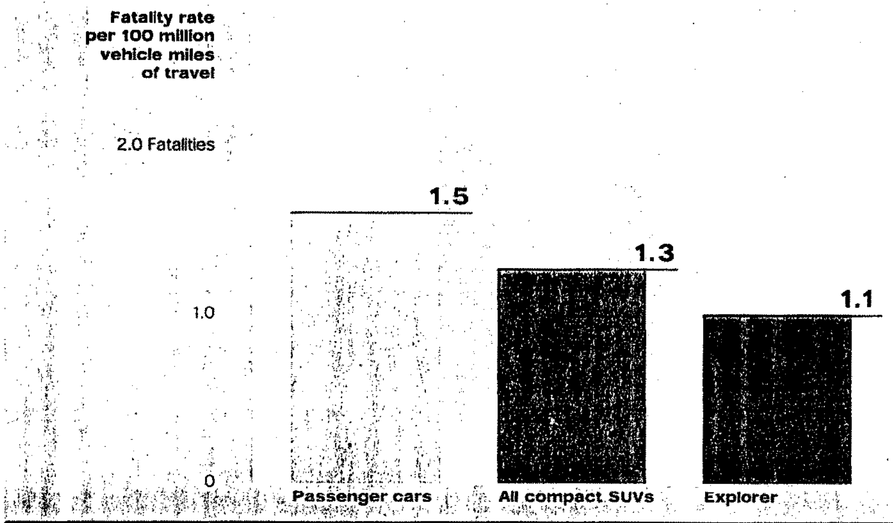
Firestone vs. Goodyear

- Model Year 1995-1997 Explorer - OE Tire by Assembly Plant
- Fatal Rollovers from 1995-1999 FARS
- Tire Noted as Contributing Factor 'as indicated in the police accident report may indicate that the tire is inadequate, faulty, damaged or defective; the condition may be due to owner/user neglect, poor or sub-standard maintenance, tampering or defective manufacturing' (per FARS Coding and Validation Manual)

The U.S. Dept. of Transportation's FARS data shows that Ford Explorers equipped with any Firestone tires are about 10 times more likely to be involved in a fatal rollover than Explorers equipped with Goodyear tires. (Of course, the fatality rate for specific populations of Firestone tires being recalled are much higher.)

Attachment 6

Explorer safer than passenger cars



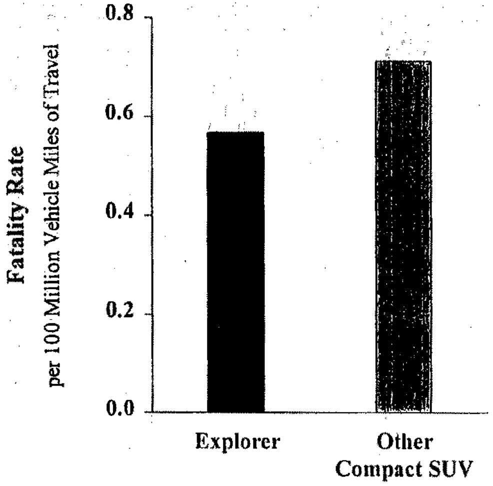
Ford Motor Company

Source: Department of Transportation Data (FARS 91-99)

Real world data shows that sport utilities are safer than passenger cars and that the Ford Explorer is safer than the average compact SUV. U.S. Department of Transportation data demonstrates that the fatality rate for Explorer is 1.1 per 100 million miles of travel, compared with 1.3 fatalities per 100 million miles for all compact SUVs and 1.5 fatalities per 100 million miles for passenger cars.

Attachment 7

Compact SUV Single Vehicle Rollover Fatality Rate



1991-1999 FARS, 1991-1999 model year vehicles with decodable VIN

Ford Motor Company

Mr. TAUZIN. Thank you very much, Ms. Petrauskas.

Mr. Baughman, do you have an opening statement?

Mr. BAUGHMAN. No.

Mr. TAUZIN. The Chair recognizes himself for 10 minutes.

Let me reconstruct the information that we have. Dr. Bailey, the information we have is that the agency requires both speed and durability testing, and durability testing currently required might be done at 26 psi. But speed testing is not. Speed testing by agency requirement is at 32 psi?

Ms. BAILEY. That's correct.

Mr. TAUZIN. So the agency does not currently have, until we make changes, regulations that require either one of these two parties to test the Ford Explorer under these heat conditions with loads at 26 pounds per square inch at speed test; is that right?

Ms. BAILEY. That is correct, but only the high speed testing is done at 32. Everything else is done at 26 psi, but not the high speed testing.

Mr. TAUZIN. Second, there are no regulations right now requiring either testing of tires for aging and normal wear conditions; is that correct?

Ms. BAILEY. There are endurance tests and they are done at 88 percent maximum load at 95 degrees and at the speeds that we normally travel in America. But that is essentially correct.

Mr. TAUZIN. That is for 1,700 miles wear, so that under current regulations, there is not a lot of attention paid or required to testing tires that have normal 2, 3 years of age and wear; is that correct?

Ms. BAILEY. Exactly.

Mr. TAUZIN. That may be a topic that we want to discuss in terms of new regulations?

Ms. BAILEY. Yes, it is.

Mr. TAUZIN. Thank you, Dr. Bailey.

Let me turn to the tests that were done as opposed to what was required. Let me start with Ford. Correct me if I'm wrong, first of all we have an affidavit that says in 1989 you ran one test at high speed—and I quote—on the UN-46 Explorer. And I quote again, that the high speed durability tests run on the UN-46 Explorer were conducted at maximum rear gross axle weight, et cetera.

The affidavit we have leads this committee to believe, as did the testimony 2 weeks ago, that Ford at least ran one test on a Ford Explorer at 26 pounds per square inch in speed tests at these proving grounds. We now learn that those tests were run on a slave or mule vehicle, a truck, not a Ford Explorer. Was this affidavit intentionally misleading?

Ms. PETRAUSKAS. Absolutely not, Mr. Chairman.

Mr. TAUZIN. What happened?

Ms. PETRAUSKAS. The tests that we run for high speed durability are done using something that we call a slave or mule vehicle.

Mr. TAUZIN. Why did you call it a Ford Explorer in the affidavit?

Ms. PETRAUSKAS. I have not talked to Mr. Avouris. He is a tire tester. I am sure in his mind when he took that mule and put it in an Explorer-type configuration through weight, to him that was an Explorer. Mr. Chairman, there is nothing devious here.

Mr. TAUZIN. I hope not, Ms. Petrauskas, but obviously it looks suspicious.

Second, this slave/mule vehicle is not a Ford Explorer?

Ms. PETRAUSKAS. No, sir.

Mr. TAUZIN. Does it have the same axle design and axle spread? Does it have any of those characteristics, center of gravity characteristics of a Ford Explorer?

Ms. PETRAUSKAS. What it has is a weight distribution.

Mr. TAUZIN. A weight distribution similar, that is all?

Ms. PETRAUSKAS. May I take a couple seconds just to put this into context?

Mr. TAUZIN. Please.

Ms. PETRAUSKAS. Fundamentally, for truck testing we have three different mules. One mule is used to test all of the 14-inch tires, and that mule for years has been a Ford Ranger, which is a small pickup.

Second, we have an F-150 which is a standard size pickup, and that mule is——

Mr. TAUZIN. So the tests were done with a Ford pickup truck, a F-150; is that accurate?

Ms. PETRAUSKAS. I want to be clear. It was a pickup truck that was modified to reflect the weight distribution that an Explorer would have. And so the tires that are on that truck for all they know, they are on a Ford Explorer and they are run for the 200 miles at the high speed.

Mr. TAUZIN. Is the axle wider or longer than the Ford Explorer?

Ms. PETRAUSKAS. We can give you the details.

Mr. TAUZIN. I think the answer is yes. That is what we were told last night; that the axle width and the length of the drive system are very different than a Ford Explorer. So I think the information that we got last night is accurate. Correct it in the record if we are wrong.

Let me run through the rest of this quickly. Here is the information that we have. That Ford ran a single test in 1989 before putting these vehicles with these tires on them into production and sale at 26 psi at high speed; but on this mule/slave truck, not a Ford Explorer. But again in 1994, Ford ran some tests, again using an F-150, and we have the records of those tests.

Ms. PETRAUSKAS. Right.

Mr. TAUZIN. In 1995 you ran some tests, but you don't have those records and can't produce them.

Ms. PETRAUSKAS. We are still looking for them.

Mr. TAUZIN. In 1998 you made the decision to turn the testing obligation over to Firestone. Until 1998 it was your responsibility?

Ms. PETRAUSKAS. What we did about 1998 was we actually changed the procedure from using slave vehicles, where you physically jiggled the weight around in order to simulate the particular vehicle to which the tire is applied, to using something called a tire dynamometer, and that is like an exercise machine for the tire.

Mr. TAUZIN. Am I correct in 1998 Ford turned the responsibility over to testing to Firestone, in 1998?

Ms. PETRAUSKAS. I believe that is correct.

Mr. TAUZIN. That is the information we have. If that is accurate, it also says before 1998 Ford assumed, as Mr. Nasser's corrective letter tells us, Ford had the obligation of testing these tires on the Ford Explorer?

Ms. PETRAUSKAS. That is correct. We used the high speed testing. The process we used was the one that I have described to you using the mule vehicles. I will talk real fast because I have to——

Mr. TAUZIN. Please, because I have to move quickly.

Ms. PETRAUSKAS. One of the things we have attached to our written testimony is sort of the Bible of tire testing. What that does is it lists some 20-odd steps.

Mr. TAUZIN. We have that.

Ms. PETRAUSKAS. In each of those it tells you whether a slave vehicle is used or whether——

Mr. TAUZIN. A machine?

Ms. PETRAUSKAS. Either a slave vehicle or this tire exercise machine; or where it says EP, it is an engineering protocol or a mechanical protocol. In those cases, those are Explorer vehicles.

Mr. TAUZIN. Exactly. In July 2000, Ford made a special request of Firestone to test some tires. Our information is that the tests were run on tires that were produced not at the Decatur plant but at the Wilson plant, and those tires are not even recalled tires; is that accurate?

Ms. PETRAUSKAS. What is the date?

Mr. TAUZIN. July 2000. Ford made a special request of Firestone to test tires. They were run on Wilderness, not ATX tires.

Ms. PETRAUSKAS. Mr. Chairman, is that in the book here so I can look at it?

Mr. TAUZIN. Yes, number 20 I am told. And that these tests, these tires passed at 106 but failed at 112 miles per hour; is that accurate?

Ms. PETRAUSKAS. I am going to have to take a minute to review that.

Mr. TAUZIN. Let me go to Firestone.

You did the test. Our understanding is that at Ford's request you tested, in the year 2000, in July, Wilderness tires manufactured at the Wilson plant, and that those tires passed at 106 miles per hour, but failed at 10 minutes at 112; is that correct?

Mr. SAURER. I don't know the details that they failed at.

Mr. TAUZIN. If you would respond in writing.

I want to turn now to Decatur. I want you to tell us what happened at Decatur in 1996. Here is the information that we have; correct me if I'm wrong. The information we have is that quality control at Decatur randomly selected 239 tires for high speed tests, and those tests were run at Decatur in 1996. Our information is 110 were preproduction tires, and 125 were production tires. That is 54 percent of the total. That of the 129 production tires that were tested, our information is that 15 failed. Your information is 11.

Let's assume that a dozen or so failed. Our information is also that the majority of that dozen failed because of tire separation. Our information is that in 1996 in these high speed tests conducted for quality control at Decatur, that about 10 percent, 1 out of 10 of the production tires, failed. I don't think that is an insignificant number. Anyone who looks at that objectively, I think, would conclude that you have a horrible, flawed process in place in 1996 producing a 10 percent failure rate in the test.

And the question is if those numbers are accurate, why would Firestone not report that to headquarters? You are making several million tires that year and selling them to the public, tires that are now subject to recall. Members of the public will be riding on tires that your own tests in 1996 say are going to fail 10 percent of the time potentially. How could you possibly have not known in 1996 that you had an obligation to recall those tires, to notify NHTSA, to notify headquarters, not only to stop production of them, but to recall those that you put in the hands of American consumers whose safety is now at risk? How could you assume that a 1 out of 10 failure rate was insignificant? Or not significant enough for you to issue immediately a recall to save lives? Please respond.

Mr. LAMPE. If I can comment briefly about the test and Mr. Saurer will talk about more the results. We are talking about a test that is a test that we agreed to do, that we do on our own. This is a Society of Automotive Engineer test. It is not a required test to do.

Mr. TAUZIN. We know that.

Mr. LAMPE. It is a very, very severe test. It is a high speed test. It is designed to take tires right up to their limits.

Mr. Tauzin, if we don't have tires that fail tests, then those tests—what value are they? It takes them up to their limits. We expect to see some tire failures in the tests.

Mr. TAUZIN. But they are supposed to make that limit. They are supposed to survive at that limit. They failed you in 10 percent of the cases. I want to know what happened inside Decatur. What is in the mind of the people at Decatur when they see these results and fail to notify headquarters, when that information is kept in Decatur instead of headquarters and not transmitted to Dr. Bailey's agency? When there is not an immediate advisory to Americans that we are experiencing a 10 percent failure rate on tires that are expected to meet that limit? What is happening in the minds of the men and women in charge at Decatur when you see these results and decide not to advise Americans that they are riding on tires that have not met the limits that they should be meeting?

Mr. SAURER. Mr. Chairman, first of all, we need to understand, as Mr. Lampe said, this is not a basic test of safety. This is a high speed rating test. The DOT 109 requirements of high speed and endurance which is run at 26 psi were fully met in these tires and far exceeded the standard. We don't view this as a safety issue at all.

Mr. TAUZIN. Let me stop you there.

Ms. PETRAUSKAS. Mr. Chairman, would you yield to me?

Mr. TAUZIN. I will yield to you in a second. I want to correct the record. The requirement of the agency was not to test these tires at 26 psi at high speed. The requirement of the agency was 32. All I am saying is that you went beyond that. You did some testing on your own. Whether you are required to or not is irrelevant. The bottom line is that you did the testing. The tires failed.

And I simply would love you to respond to that central question that I know is burning with all of us: Why did you not notify someone at headquarters that you had a major production problem? You were producing bad tires. You don't know today what went wrong. You certainly couldn't say what was wrong then. All you knew was something was badly wrong and you told no one about it. That is what is burning before us today, and if we are going to correct the situation with legislation, we need to know how and why. How can that happen at a plant in America?

Mr. STUPAK. Which document are you referring to?

Mr. TAUZIN. I will let staff identify it in a moment.

Mr. SAURER. Our data, and we looked at this last night when we heard the press report, we see 6 tires that failed from a belt separation during that timeframe. The majority of those tires, 17, were qualification tires in process and never went into manufacturing.

This particular test, as has already been said, is a very severe test. We run it to its limits. We have a process when there is a failure that the plant goes through to recheck. If they continue to have a problem, the plant is shut down and requalified and corrections made.

Mr. TAUZIN. What about all of the tires that you have produced and sold?

Mr. SAURER. I don't think that this test by itself represents a safety problem.

Mr. TAUZIN. Let me yield to the gentlelady.

Mrs. WILSON. Thank you, Mr. Chairman. I will pick up this line of questioning during my time.

Mr. TAUZIN. The Chair recognizes the gentleman from Massachusetts.

Mr. MARKEY. Thank you, Mr. Chairman, very much.

I want to continue along this vein of tire testing. As I understand it, these tires are tested at 85 miles an hour, 95, 100 miles an hour and more, but for very brief periods of time. For example, it is my understanding that in order to pass initial production qualifications, a tire must only survive 6 minutes at 95 miles an hour. Six minutes. Ford has its own high speed test that requires the tire to maintain 106 miles an hour, but only for 10 minutes. That is all the stress that this tire is exposed to.

NHTSA in its high speed performance tests runs tires at 75 miles an hour, 85 miles an hour, but for half an hour. That is what this tire is tested for. Half an hour, 10 minutes, 6 minutes. And the test is only performed at 88 percent of the tire load capacity, not 100 percent; 88 percent of the tire load capacity, and at a tire pressure of 32 pounds per square inch.

The testing at the increased higher pressure above the recommended 26 psi is done because purportedly for any high speed driving, Americans are supposed to inflate their tires. So in other words, people know that they are going to travel 500 miles or 1,000 miles for a vacation, and Americans are assumed by NHTSA, by Ford and Firestone, that they are all going to go to the gas station and make sure that they get the right tire pressure. That is not the way that the world works.

People have trusted you, NHTSA, Ford, Firestone, to protect them in advance of that. So my question revolves around these tests. In recent years, many States have lifted their speed limit above 55 miles an hour. In many States in some areas of their

State it is 65 miles an hour, it is 75 miles per hour, and we all know that when the speed limit goes up to 75 miles an hour, people start driving 10 to 15 miles an hour faster than that. And they are not doing it for just 6 minutes or 10 minutes, they are doing it for hundreds of miles. But there is no testing for that. No testing.

My question to you is this: How can any of you justify not testing these tires after 2 years of use? And I want to hear each of you justify to American families that you haven't put in place a testing system that ensures—and let's be honest, those are the tires that people are riding on. They are riding on 2- or 3-year-old tires, not brand new tires, in a special test for 6 minutes, but a 2-year-old tire on a road going 1,000 miles at 75 miles an hour perhaps, with two kids strapped into the back seat. How can you justify that you have not performed tests that tell these families, who assume that you have done these tests, that their families are safe?

Mr. SAURER. Let me try to respond. We do, as we have indicated, many more tests beyond the DOT requirements as well as the Ford requirements in this particular case or any other vehicle manufacturer's requirement. We have outdoor test facilities where we run 40 million miles annually. We have laboratories and research facilities where we are looking at the development of compounds and——

Mr. MARKEY. Do you do tests at 2 years of age on these tires?

Mr. SAURER. We artificially age our tires.

Mr. MARKEY. Do you take 2-year-old tires that have been on actual vehicles and test them? Not artificial; real world tires that have been on the road in Arizona in 100-degree temperature for half of the time that they have been on the vehicle and bring them in and test them?

Mr. SAURER. We don't do that specifically, no, because we cannot control. When we do a test like that, we have no idea what the usage conditions——

Mr. MARKEY. You do have an ability to control that, Mr. Saurer, you can give those tires to your employees and you can ensure that those employees have told you exactly what they have used them for. That is what happens at Converse Rubber with their sneakers. They give them to their own employees. Converse Rubber was three blocks from my house, and they used to give our high school basketball team a pair of sneakers each year, and we gave them back at the end of the year. We had a promise that we wouldn't take them home, so they knew how many hours and how many games we practiced on them. At the end, they took them back. Why can't you do that for your own employees?

Let me say I think that you have disserved the public, Mr. Saurer, by not taking the most stringent precautions to protect American families. There is no reason that you can't take real world tires and test them.

Mr. SAURER. We do take real world tires and test them. Our employees have run our tires. We have analyzed those tires. We go out in the field and examine——

Mr. MARKEY. You just told me that you can't construct a test——

Mr. SAURER. You asked a different question. Let me explain. We go out into the field and we look at tires that are returned in the field through normal warranty adjustments and we examine those tires. They have been tested in the real world. We look for any particular weaknesses in those tires. That is one of the key bases for which we develop new technology to improve the product as we go forward.

Ms. BAILEY. Congressman Markey, our testing is clearly outdated, and this winter we are going to update that test. There is no justification for that. At the same time, I should——

Mr. MARKEY. No justification for what?

Ms. BAILEY. For tire testing standards to be based on standards that were set 30 years ago, and we are intent on——

Mr. MARKEY. Meaning testing for only 6 minutes or 10 minutes or half an hour?

Ms. BAILEY. Our endurance test goes for 34 hours, so we are testing for long enough, but that is not good enough. But you are right, they are not old tires. I should say if any of the tires that we test fail at all, they are not to be sold and there is a recall. But that test, I agree, is not where it should be.

Mr. MARKEY. Do you test 2-year-old tires for 34 hours? Do you test 5-year-old tires for 34 hours? There are many Americans driving 34 hours.

Ms. BAILEY. And there are many people driving on tires which have been at it for 20,000 miles and 30,000 miles. We are looking for legislative support so we can make changes like the one that you are talking about. We need to be looking at the psi, the temperature that we run them at, and they need to be older tires so it has a real world import.

Mr. MARKEY. I think, to be honest with you, that it is not a big request to Ford, to Firestone, to NHTSA, to have one test per year with tires that are 1 year old, 2 year old, 3 year old, 4 year old, 5 year old, knowing that the danger of families being in danger as each year goes by as the thread is thinning out and they are trying to squeeze the last few thousand miles out of their vehicle because they are working class families; but they are still assuming, because there is no warning that comes from the Federal Government or the manufacturers. That their families are in fact now more and more endangered.

Mr. LAMPE. We agree. We all agree. We agree with NHTSA as a company. We agree as the tire industry that we must work together to develop more accurate, more robust, more real world type testing, and we support that and we will work to those ends.

Mr. MARKEY. We have fuel gauges, we have oil gauges, we have temperature gauges. There was no standard for a rear-view mirror or defroster, but we put that on the books over the years. Would you oppose a mandate that every automobile manufactured or sold in the United States has a tire pressure gauge on the dashboard that parents can see and know whether or not their children are being put in danger? Would you object to that?

Ms. PETRAUSKAS. As our president testified when this committee held its last hearing, we are actually investigating that kind of——

Mr. MARKEY. Would you object if we mandate it?

Ms. PETRAUSKAS. No. The one thing is that we urge all of us when we look at a requirement like that is to think about what is it that we want.

Mr. MARKEY. We will work with you to make sure that is done in cooperation with the industry, but would you object to it?

Ms. PETRAUSKAS. No, of course not.

Mr. LAMPE. Mr. Markey, we have been a proponent of that for years and years. We are very much in favor of that. If we can have a gauge that tells us when our windshield washer fluid is half empty, we can certainly have an indicator that tells us when our air pressure has gone down.

Mr. MARKEY. Dr. Bailey, do you think that is a good idea?

Ms. BAILEY. NHTSA sets performance standards. In this case obviously, the performance was not there. That usually means that there are design changes, and I would certainly endorse those kinds of design changes.

Mr. TAUZIN. Just to follow-up on the gentleman quickly, isn't it true that Ford is putting those indicators on new model years in the Middle East?

Ms. PETRAUSKAS. We are actually looking at them. One of the things that we really need to look at is what else do we want this system to monitor; and one of the really intriguing things is if you can get it to monitor temperature as well as pressure and use that to give an indication to the customer. So the work is underway, how we might be able to have a reliable system like that.

Mr. TAUZIN. Why only in the Middle East?

Ms. BAILEY. Congressman Markey, I might just add that the Toyota Sienna van has that already in place.

Mr. TAUZIN. Why are you only doing this on new models in the Middle East?

Ms. PETRAUSKAS. No, we indicated in our testimony that we are looking at this as something that we go across the board with.

Mr. TAUZIN. Here is the status. We have a vote on the floor. Mr. Upton is returning from that vote and I will be able to hand the chair to him. I yield now to——

Mr. MARKEY. Just to clarify. Dr. Bailey, did you say that you would support mandating a tire gauge standard? Yes or no?

Ms. BAILEY. I would support—yes, I support that.

Mr. MARKEY. Okay. Thank you, Doctor.

Mr. UPTON [presiding]. Okay. Thank you again for your testimony. I guess, Dr. Bailey, particularly I want to thank you for your help in the meetings that we have had the last couple of weeks as we've tried to design legislation that in fact will fix the problem from happening again, as we did not see after the Firestone 500 recall back in the seventies.

And I guess I just want to expand on a couple of things that Chairman Tauzin indicated, particularly as we look at the legislation that yesterday was adopted in the Senate in the full committee, John McCain's Committee on Commerce, and I would expect action here in the House as well as we look to mark up in the subcommittee this afternoon and conclude hopefully next week, and going on a pretty fast track here.

One of the items that was, I believe, in the McCain bill and is in our bill is, of course, the requirement to you—to NHTSA—to in fact revise the tire safety standards that have not really been revised since 1968. I know that you mentioned that briefly in your testimony a couple weeks ago, and as we look at—as this will happen one way or the other, I think that it is very important that particularly you look at label requirements. We've seen documents inserted in the record today in terms of what consumers actually do when they look at their tires, whether it be on the sidewall, whether it be on the door, whether it be on the owners manual. But we really try to have NHTSA look at the whole range of testing—a variety of different psi, a variety of different loads, and to make sure that in fact we have a "Good Housekeeping Seal of Approval" by NHTSA on all tires and where it can be adequately reviewed to make sure that the maintenance is there by all consumers. And I think that that's exactly where you're headed; is that correct?

Ms. BAILEY. That's exactly where we're headed.

Mr. UPTON. The FARS data that became available last week from 1999 indicated—and I think that that is where the additional death came from, the tires; is that correct? In the hearing 2 weeks ago there were 88 deaths attributed to Firestone tires.

Ms. BAILEY. No, sir, that is not where the data came from; the data that you've heard today, that we're to 101.

Mr. UPTON. 103.

Ms. BAILEY. I need to correct that. And what you're hearing is that—this is a data entry change I need to make here—that we had received a report that was taken by a young college student who was doing data entry for us and it said there were two fatalities, but on the second page it indicated that those two fatalities were indeed pets, and so we had to change the record and it is now 101 fatalities. That is accurate.

Mr. UPTON. Did that come from the FARS data?

Ms. BAILEY. No, sir; it did not. That comes from our system of complaints that are received by NHTSA and the review of those complaints and tallying of that data.

Mr. UPTON. Has anyone actually analyzed the FARS data for 1999? I know it is now available. Has anyone actually looked at the data and seen what conclusions they may bring?

Ms. BAILEY. Yes, sir, they certainly have. But you are right in assuming that or suggesting that we have not integrated our FARS data as well as we might. At the same time, you need to understand that the FARS data is coming in from all over the country from law enforcement. It does not include complete information that lets us on a regular basis know exactly what happened in any particular crash or fatality. At the same time, we need to mine that data. We need to integrate our data bases so that we have all the information at our disposal at all times.

Mr. UPTON. Thank you.

Mr. Lampe, at our hearing 2 weeks ago, Firestone testified before Ford testified. And Ford shared with us a document that I think I have here, on the stand over here, with regard to the instances of failures or claims rate, specifically at the Decatur plant, and it relates it to other facilities that Firestone owns and operates.

As I look at my own plants—and I went through a number of plant tours this last week when I was in Michigan—one of the things I routinely ask is: What is the percent that doesn't make the grade and the quality assurances that are given up the line? And one of the things that Mr. Tauzin focused on, and a number of us in our opening statements as well, was that at the Decatur plant there were early indications that in fact the quality of these tires, they were not meeting the test. It should have been an early signal to Firestone that there were problems with that test.

When you look at the data here that Ford was able to get from Firestone, it really jumps off the page. What did you do with this information, and at what stage did you put it all together? Because in your statement today that just yesterday you asked—you sent a letter to Ford, asking that they increase the psi from 26 to 30 on these tires—is years too late when you've got data like this which shows that there were serious problems of tire failures at that particular facility.

Mr. LAMPE. Mr. Chairman, the data that you're referring to is claims data, and I'll come back to that and I'll try to be very brief. The normal measurements, the proven measurements that we have used and the industry have used over years has been field surveys, testing that we've talked about, and adjustments data, when a customer walks back in and has a tire that he has a warranty claim on. We've used those. All of those measures, even the testing, which we will explain, said that those tires were good tires. It wasn't until that we looked at the claims data, and I will say with great assistance from Ford, from a statistical and analytical ability to look at the claims data, that we saw the overrepresentation in claims data in Decatur. Let me explain real quick when I say claims data because it is very confusing——

Mr. UPTON. Before you finish. The claims data, from what I understand, you knew this claims data in 1997.

Mr. LAMPE. We've had access, yes, sir. We've used and had access to that claims data for a number of years. We've never used it as a performance measure.

Mr. UPTON. But if you had that data in 1997 and if you knew that these tires were failing in terms of randomly taking them off the line and testing them at 6 minutes at 110 miles an hour, and testing them where you thought they might fail, and knowing that tires made in other facilities in fact were passing the test, why wasn't that a signal to send up the line, whether it be to the Ford showrooms or to the consumers, or certainly to your quality control people at headquarters, that there was a problem?

Mr. LAMPE. From the testing standpoint, Mr. Chairman, I'll go back to the test that we ran; was a test that is much more severe, much more abusive than is the 109 test.

Mr. UPTON. I understand that.

Mr. LAMPE. When tires fail on that test, Mr. Chairman, we don't turn our backs or close our eyes to it. We have a procedure that we go through to retest multiple tires, multiple tires, to ensure that those tires pass. We don't just let the test go. We retest in every situation. As far as the claims data, we've said, Mr. Chairman, we wish—we all wish that we would have done a better job or used that claims data differently than we used it for.

Mr. UPTON. There were some changes made to the tire later on; is that not right? Redesigned with some wedges and thicknesses of the sidewall. There was some new standards that were adopted for the production of that tire, were there not?

Mr. LAMPE. Sir, we'll talk about those two specific changes, but we make changes all the time in our manufacturing process in our construction of our tires.

Mr. UPTON. Did those changes come about because of the failures of the tests in Decatur?

Mr. LAMPE. No, sir.

Mr. UPTON. When you tested those—are these tires only made at Decatur, the tires?

Mr. LAMPE. Which tires are you referring to, the Wilderness tires, sir?

Mr. UPTON. Correct.

Mr. LAMPE. No, the Wilderness Tires are made at a number of plants, including Decatur—were made in Decatur; they're not made in Decatur anymore.

Mr. UPTON. But did those tires when they failed the test in Decatur, when you randomly took them off the line—whether it was 5 or 10 percent, it is still a significant number of failures—did you have that same type of incidents at other facilities where you made the Wilderness tires.

Mr. LAMPE. Sir, the tests we're referring to, if I'm not mistaken, my understanding is the majority of the tests on tires were ATX tires, I believe, and the ATX tire was being produced at Decatur at a much, much, much greater level, production level, than in the plants. And if that data is not correct, I'll get you the correct production data and I'll supply it to the committee. I'm sorry.

Mr. UPTON. My question is, you knew in Decatur that the tires were failing in terms of the tests that were conducted on those tires at a fairly significant rate, somewhere between 5 and 10 percent of the tires that you took off in a random way. Did those same tires produced in other Firestone facilities have the same type of failure rate that they had in Decatur?

Mr. SAURER. Mr. Chairman, I am not sure of the failure rate, but it's not uncommon to have these failures. Let me correct something—before I forget—for the record that John said. The sidewall gauge change that we made at Decatur was in correct response to the SA high speed. The wedge change is a totally different issue of continuous improvement. And when we made that change in the lower sidewall of the tire, this is a minor gauge change of rubber to control the thickness. It's a specification that went across all plants for just additional control.

Ms. BAILEY. Congressman Upton.

Mr. UPTON. Yes.

Ms. BAILEY. We are concerned about the Decatur situation because the wilderness tires that were part of the recall were only from the Decatur plant. We are sending an investigator out there in about a week to work together with the manufacturers to try and understand what has happened at Decatur, whether there is something significant in that plant.

Mr. UPTON. I yield to my colleague and friend from Michigan, Mr. Stupak.

Mr. STUPAK. Thank you, Mr. Chairman.

Dr. Bailey, NHTSA really doesn't have standards for steelbelted radial tires, correct?

Ms. BAILEY. I would not go that far, but the fact that these same tires passed our test in 1997 certainly alerts me to the fact that our 30-some-year-old standard apparently is not providing us with the security we'd like for tire safety.

Mr. STUPAK. You said they passed your standard in 1997, but that standard is based on 30 years ago.

Ms. BAILEY. Yes, sir.

Mr. STUPAK. So 30 years ago we didn't have steelbelted radial tires.

Ms. BAILEY. Actually it was in 1968, and there were radial tires at that time. But you're correct, that basically at the time we had the bias two-ply tires.

Mr. STUPAK. So if you have a bias two-ply standard over here and you're dealing with a steelbelted tire over here, how can you say that they pass the standard when you're talking really about apples and oranges?

Ms. BAILEY. Well, I should also say we require tire manufacturers to certify tires to dynamic laboratory tests, and they are similar to the compliance procedures around the world. It does not change the fact that you're right. This is an old standard, 30-year-old, and we are looking to change it this year.

Mr. STUPAK. Well it's a little after the fact. And I know you've just been there and I know you just got there a couple months ago. But the fact is that the standards that you speak of at NHTSA is really something that is not comparable to today's tire. So, No. 1, we have to establish before we can say pass or fail, we have to say this is the standard, and the standard has to be brought to today's tire, correct?

Ms. BAILEY. We are analyzing the engineering data now to determine whether there is something inherent about the test that is inappropriate. If you recall, much of it is appropriate. It may be, as we heard from Congressman Markey, that it is the fact that we are not using old tires, that we're not going far enough with our testing, because in fact it's at 95 degrees; it's at 75 to 80 miles an hour.

Mr. STUPAK. And 112 miles an hour. I know all that.

Ms. BAILEY. And at 30 and 26 psi. So I guess what I'm saying is I completely agree with you. We need to update the test, but we're evaluating now the nature of that update.

Mr. STUPAK. Before you can test anything, you have to have a standard. The standard has to be current with the tire you're testing, right? So really, if we're going to change things and there's going to be a markup later today in one of the subcommittees and talk about what should be done, isn't the place to start is to have a standard for today's tires, not a standard that was set back in 1968 for two-ply tires? Wouldn't that be the place to start?

Ms. BAILEY. Yes, sir. That's why we have a proposal that would come out this winter to make that change. I would appreciate your support on that.

Mr. STUPAK. We have to have some standards and I think we should start there with some standards. When you say about the testing, the American public understands that's based on a 1968 radial tire ply. You called it right; a two-ply tire, not steelbelted tires, correct.

Ms. BAILEY. It's not entirely based on that tire versus today's tire. I can't say that from an engineering point of view, but it is outdated and needs to be changed.

Mr. STUPAK. So we need current tire standards, No. 1.

Ms. BAILEY. Yes.

Mr. STUPAK. No. 2, I think we agreed that we are going to have tire pressure, you agreed with Mr. Markey that was a good idea, like we would have on the dash. The markup is at 1 o'clock today. What else would you recommend we have? Mr. Upton has some legislation. What else would you recommend?

Ms. BAILEY. The two main points in the legislation—and I appreciate he's not here, Congressman Upton's working on that with us, at least meeting with us about that. First, is the additional authority to obtain the data that you just heard about. That claims data that you saw on the bar graph would have been invaluable to us. We need that claims data. We also need the authority to receive data about recalls around the world. Also, we need to have appropriate funding in order to provide the regulations that will ensure the safety of Americans.

Mr. STUPAK. Third was authority to get the data you need. Fourth was recall around the world you need to be made notice of. Fifth was what now?

Ms. BAILEY. Claims and warranty information domestically, authority to receive information about defects and recalls outside of the United States.

Mr. STUPAK. That was No. 4. Fifth was budget.

Ms. BAILEY. Budget. And we could get real specific. There are several other things, including extending the recall period from 3 to 5 years for tires and 8 to 10 years for vehicles, and removing the cap so that our civil penalties actually promote safer production.

Mr. STUPAK. Are you recommending any criminal penalties?

Ms. BAILEY. We have the ability at this time to make a referral to Justice for criminal actions if there are egregious violations of the law. At this point, whether or not there would be criminal penalties has not been determined, but I think we can all understand that that may allow us greater enforcement capability.

Mr. STUPAK. So you're not asking for that then?

Ms. BAILEY. That is one of the things we're looking at in a multitiered approach for enforcement.

Mr. STUPAK. Okay. But you don't think the committee should bring that up or that should be something—that's something you're not seeking today? Because we have the markup today. You're not seeking that, correct?

Ms. BAILEY. Actually the Secretary will be testifying to that later.

Mr. STUPAK. So you have about 7 or 8 things. Anyone else on the panel think NHTSA should do something different or some other standards? Mr. Lampe.

Mr. LAMPE. Sir, we agree with those revisions and those things we need to do differently. We support those. We would also support any kind of standard or testing that can better identify the interaction between a tire and the vehicle and what happens in an accident causation. I am not sure that would be something that

NHTSA would do from a standard or regulatory, but we certainly support what Dr. Bailey mentioned in the other one as well.

Mr. STUPAK. Much along the lines Mr. Markey was talking about, real world circumstances, some kind of testing there.

Mr. LAMPE. Yes.

Mr. STUPAK. Anything from Ford. Go ahead, Mr. Saurer.

Mr. SAURER. I think we would want to be careful about throwing away all the current standards. There should be some consideration of raising the minimum. We have a lot of test background and a lot of test data with the current tests, and certainly we'll work and support along those lines but I think another consideration could be looking at the minimum requirements being raised as opposed to trying to create some new unusual test that may take a long time to develop and have understanding of its importance.

And the other thing, because I think these standards have served us well for passenger car tires over the years, but in this class of SUVs and light trucks particularly, and it's growing, it's a very booming market, I think that's where the major issue is. And so we will also certainly promote more than an air pressure gauge on the dash. We would like to see air pressure monitoring systems, particularly in SUVs. Their technology is growing and I think that that's realistic to think about it in the future, and we might even do it like other—if we want to get really high-tech, is when pressure gets too low, the speed is restricted by a computer in the vehicle is the ultimate goal.

Mr. STUPAK. Anyone else?

Ms. PETRAUSKAS. I want to add that. I think when our president testified, Jack Nasser laid out pretty much our position on these various issues. I think to us, the driver, is it really going to improve real world safety? And if it is going to make that improvement, then we should do it and we should do it quickly. And we only hope we're given the opportunity to participate in the development of those.

Mr. STUPAK. Mr. Nasser mentioned two things: the early warning system and recall around the world. We've had about eight of them now put forth on the table, as a general rule, for it.

Ms. PETRAUSKAS. Actually we were asked—maybe I am getting my hearings mixed up between the House and the Senate—but I think we were asked about the various elements. We supported increasing the level of civil penalties. We supported improvements to the brake standards. We started work to try to develop a rollover standard. And then finally we indicated response to a question whether we could conceive of truly egregious, unusual circumstances where there is a clear potential to do harm to another person; whether we would agree that criminal penalty might be appropriate in that sense, and our position was yes. In those kind of circumstances, I might hasten to add that I haven't seen all of the provisions, but I've seen a couple of them, but I'm not sure that's the situation they describe.

Mr. STUPAK. Let me ask one more question, if I may. The chairman asked some questions about Decatur, and that 10 percent of the tires failed at Decatur and Firestone headquarters was not notified. And in talking with the chairman, the basis of that came from these documents that have been received by the committee from Firestone. Do you have any reason to dispute the chairman's conclusions of the 10 percent failure in failing to report from Decatur on up to Bridgestone headquarters, Firestone?

Mr. LAMPE. I think the chairman pointed out himself in the opening remarks, that when we look at what we talked about, tire failures, tires not meeting the testing requirement, there were a significant number, more than half I believe, Mr. Chairman, of tires that were not production tires. They were prototype tires. They were tires that we test to see if we can put them into production.

The number that I don't know that we agree on, the number that I don't know that we agree on or not, is we had—I believe I recall six cases of all the tests we've done in Decatur, we had six cases where we had a tread separation indication. They were all at the very last step—I'm sorry, at the very last step of the high speed SAE tests, not the normal 109.

Mr. TAUZIN. Would the gentleman yield a second?

Mr. STUPAK. Yes.

Mr. TAUZIN. I want to make sure this is very clear. In the 10 percent numbers I used, we discounted all of the preproduction tires. Let me go through them because this is extrapolated from the information you provided us. There were 239 tires tested. Of that, 46 percent were preproduction tires; 54 percent were production tires. The majority were production tires. Looking only at the production tires tested, our numbers are 15 failures out of 129. Your numbers are 11. We have a little dispute as to how we count them. But even giving you the benefit of the doubt at 11, we're talking about nearly 10 percent failure rate on the 129 production tires, not preproduction. I yield back to the gentleman.

Mr. STUPAK. So you would not dispute those numbers.

Mr. LAMPE. No, I would not dispute. The only number I would clarify is that out of the 11 or 14, whatever we could agree upon, only 6 of those had a failure mode of tread separation that we're seeing here.

Mr. STUPAK. But even if you use your 6 percent or 6, excuse me, 6, that's still 5 percent that's more than was acceptable, wasn't it?

Mr. LAMPE. Again, that's a very abusive test. It is a high speed test run at very high speeds and under a loaded condition.

Mr. STUPAK. My question is, that is more than what you would expect.

Mr. LAMPE. Mr. Stupak, let me clarify one more thing, please; I am not trying to avoid the question. This test is done in a closed room, in a concentric drum, on a curved drum. It is much more of a duress test than you would get if you ran the same speed on a highway. Because the fact that it is closed——

Mr. STUPAK. But that test is only 6 minutes at 112 miles an hour. And if someone runs that speed on the highway, it will be more than 6 minutes. It's going to last longer, and you would expect the tires to blow apart, would you not?

Mr. LAMPE. Tires could possibly fail if someone ran at those speeds for that extended amount of time; yes, sir.

Mr. STUPAK. And you do it for 6 minutes. But if it happens in the real world it will be more than 6 minutes. Now, that's higher than what you would expect, isn't it? Use your number, 6 of them, that's 5 percent. Five percent is higher than what you would expect. Why didn't you report it to anyone?

Mr. LAMPE. Sir, in every case we retested the tires again. We didn't close our eyes, didn't walk away from a problem we had in the test. We retested the tire. The procedure is to test multiple tires to make sure if that tire failed for a testing deviation or what. We test. We don't simply ignore the fact that we have a tire that didn't make the final step.

Mr. TAUZIN. The gentleman's time is expired. The Chair recognizes the gentleman from Tennessee, Mr. Bryant, for 10 minutes.

Mr. BRYANT. Thank you, Mr. Chairman. We've done a lot of preparation for these hearings and learned more about tires than we could ever imagine. And I know as a person who drives a lot each year, in looking at some of the concerns, I have failed to have proper inflation, and speed, loads, and these kinds of things. As an average driver, I think I have failed to appreciate what good tires I have had over the years and not to have suffered this type of damage.

I know there are different numbers out there. I was looking at something here regarding tire wear factors, speed, tires that run up to 35 degrees hotter and wear up to 30 percent faster when operated at 65 miles per hour rather than 55. Underinflation—tires run up to 75 percent hotter and wear up to 50 percent faster when underinflated by 30 percent. Overloading—tires wear up to 30 percent faster when overloaded by 20 percent; as well as the length of the run, the amount of the length of our trips, and how we drive under these conditions where we're overloaded and drive faster than 55 and don't have properly inflated tires.

These are things, again, I think have been pointed out by this committee, that all of us take for granted every day as American drivers, and we have to be concerned with some of the testing, and I'm looking toward NHTSA primarily. And I appreciate the attitude that you've brought in both hearings and that you're willing to look at updating these standards or the testing standards and so forth. Because 27 years ago, no one knew what an SUV was, much less envisioned what we would be doing today.

But that said, we do hold an obligation to our consumers that we anticipate these and put safe products on the road. Again, I think the majority of—obviously, the clear majority of these tires are safe products, but we have some situations that are developing here with not only Firestone, but with another company now, and with Ford and different vehicles there.

One of the concerns I had—I was home over the weekend and spoke at a breakfast Sunday morning, and had a man there who had an Explorer with Firestone tires that weren't subject to this particular recall. And we went out and I looked at it, and he opened the door and inside the door panel is the recommended inflation. It was 26 psi. And I recall I thought that was Ford's recommendation, but here again I saw it there.

And I do know that we've got Firestone, on the other hand, which I think asserts the position that it should be inflated to 30 psi, and you've got this conflict between an allegation of instability versus if you run it at a lower psi, then your tire is under more pressure and could cause damage.

So I'm wondering how the two of you squared that in relationship when you first started putting Firestone tires on the Explorer, when one recommended 30 and the other recommended 26. Because you've got the problem—you have rough looking tires, but everyone wants them to drive like highway tires. I know you're trying to create a hybrid situation here, but how did you square that relationship between the two companies as to what the psi should be?

Ms. PETRAUSKAS. If I might, Congressman, the documents that we submitted in response to the question from this committee over and over and over and over again, demonstrate that over almost a 10-year period, both Ford and Firestone was supporting the 26 psi. And, you know, if you stop and think about it, the Explorer performs just fine on Goodyear tires that are a 26. The Explorer performs just fine on Wilderness tires that are not built in Decatur and aren't a 26.

Mr. BRYANT. What about the Continental tires on the Ford Navigator? I don't think we can point fingers at one point here.

Ms. PETRAUSKAS. If I may take just a minute to talk about that. Finding that was a direct result of the sort of early warning system that we're working on with other companies. In that particular case, we're talking about more of a chunking of the tire. There have been no injuries. I'm sorry, there was one. Somebody bumped themselves on the head, but there were no accidents, no fatalities, no injuries. So that is a completely different kind of situation. The only connection is that some of the things that this experience with the Firestone recall has caused us to do actually helped us identify a different kind of problem, not a safety problem, but nonetheless gave us that identification early that we otherwise might not have had.

Mr. BRYANT. Thank you. I might also add that there have been no rollovers on the Navigator.

Ms. PETRAUSKAS. No, sir, there have not.

Mr. BRYANT. Firestone, Mr. Lampe or Mr. Saurer, would you like to respond again to how you squared this relationship when you put the tires on initially, to what the proper psi should be?

Mr. LAMPE. Congressman Bryant, as we said in our opening remarks, it is true that the vehicle manufacturer establishes the pressure, because they know more about what that inflation will do with the interaction of the vehicle. But, sir, yes, we agreed with that inflation pressure. It's now in hindsight that we look back—let me explain.

If a Ford Explorer, if any vehicle was to be run at their minimum amount of air pressure—which that the 26 pounds is the minimum, it would always be at 26 pounds, it would never go below 26 pounds, the vehicle would never be overloaded—we wouldn't have an objection, we wouldn't have a concern. The problem is when you're down at the minimum to begin with—and we know you've heard testimony about not taking care of our tires, not looking at our tires and so forth—when that pressure goes down, it can go down as little as 7 pounds, and you're at a critical part of the loading on a Ford Explorer 4 by 4. So we just think that minimum was not enough and would like to see it at 30.

Ms. PETRAUSKAS. If I could just clarify, Mr. Chairman, the tires we're talking about have a Tire and Rim Association range from 20 to 35. They do today, they always have. The 26 is not the minimum.

Mr. LAMPE. Twenty-six is the minimum for a speed-rated tire, Congressman. Twenty-six is the minimum for a speed-rated tire.

Mr. BRYANT. I wonder, and I had a question that was sent to me anonymously about all these factors I alluded to and how we as a driver—I guess I'm guilty of, quote, abuse, unquote, because I don't check my tires every time I drive somewhere, check the air inflation, and I don't weigh my car, and I drive over 55 miles an hour and those kind of things. But we've almost got to anticipate those things are going to occur, and if you set out the level at 26, it's going to be lower. And if you're driving a car around for a year or 2 and you're running at 22 psi, and you're driving fast, you know, I'm thankful that there haven't been more examples of this.

Mr. LAMPE. In fact, there's been a couple of studies, Congressman, that says tires will lose close to 1 psi, 1 pound a month just from normal causation, I mean, not especially a nail or anything like that. So you're correct; inflation is very, very critical.

Mr. BRYANT. I think over all, it speaks to the quality of the tires that not only Firestone but other companies have made consistently over the years, and again that there haven't been more examples of this. We've got a problem here. I'm not making anything small of this. Let me go into this, because this is one of the things that I referenced—did you have a comment real quickly?

Mr. LAMPE. No, I was going to address what I believe you're going to approach now.

Mr. BRYANT. The recall? Now I understand from the first hearing that Firestone is very aggressive about trying to replace the tires and even had an offer to pay $100 to your competitors to replace the tires. My concern is apparently in Tennessee and perhaps across the country, there are always people out there trying to take advantage of a bad situation, somehow coming into possession of these recalled tires and then selling them and people can go get new tires. What is your control over these tires after you get those back from your Firestone dealers, and what is your controlling process in securing custody of those tires when someone goes to Goodyear and Michelin to replace those? How can you account those to make sure they're not falling into the hands of these people that will try to resell them?

Mr. LAMPE. I will try to make this brief because it is complicated. There are two situations someone could get ahold of recalled tires and sell them. We're outraged that that happened but we know it probably has. We have investigators out, trying to identify when it happens. But the two situations are, one, a used tire dealer that starts with used tires in his inventory and his scrap pile that are recallable tires, so he hasn't got them from somebody in order to resell them. He had them to start with and then he tries to take advantage of the situation. He sells them for $10 apiece. A customer puts them on his car and goes in and changes them for brand new tires. It's an outrageous thing.

Our requirements for our dealers and our stores is when recalled tires are brought into them, either on a person's vehicle, or if the person buys from a competitor, he is still required to bring in the recalled tires to us. So we give him a receipt for it. We disable the tire right there on the spot either by drilling a 1-inch hole by the DOT number or by taking the sidewall and cutting it at least 10 inches. We disable it right there.

And the second thing we need to do is dispose of them properly, and we have procedures in place to make sure these tires are disposed of in an environmentally friendly way. In fact, we just got praise or a citation from the EPA on some of the things we're doing with the recalled tires.

Did I address your problem? It is a terrible situation. People will try to take advantage of the situation, but we're out to try to stop it as much as we can.

Mr. BRYANT. Thank you. I yield back.

Mr. TAUZIN. The gentleman yields back. The Chair recognizes the ranking minority member of the full committee, Mr. Dingell, for a round of question.

Mr. DINGELL. Mr. Chairman, I thank you. Dr. Bailey, in a letter to me dated September 6, 2000—which I ask unanimous consent be inserted in the record.

Mr. TAUZIN. Without objection, it is so ordered.

Mr. DINGELL. You said that before the NHTSA ever received the 21 State Farm complaints about Firestone tire failures, in 1998 the agency received, "26 complaints that were relevant to this investigation." I also ask, Mr. Chairman, that a number of other items of correspondence between me and NHTSA be——

Mr. TAUZIN. Without objection, it is so ordered.

[The information referred to follows:]

U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

Administrator

400 Seventh Street, S.W.
Washington, D.C. 20590

SEP 6 2000

The Honorable John D. Dingell
Ranking Member, Committee on Commerce
U.S. House of Representatives
Washington, DC 20515-6115

Dear Congressman Dingell:

Thank you for your August 31, 2000 letter of inquiry concerning the Firestone tire investigation. Your specific request pertains to actions taken by NHTSA staff after receiving the July 1998 submission from State Farm Insurance Company.

On July 22, 1998, State Farm submitted an e-mail reporting 21 failure inquiries on Firestone ATX P235/75R15 tires (copy enclosed). These 21 reports covered seven calendar years (1992-1998) as follows: 1992 - 2; 1993 - 0, 1994 - 4; 1995 - 2; 1996 - 3; 1997 - 6; and 1998 - 4. Of the 21 reports received, the vehicle's mileage was furnished for eleven, and of those, seven were in excess of 45,000 miles. At the time of the e-mail, millions of tires had been produced by Firestone.

As part of their routine screening procedures, ODI staff reviewed this data and filed it, believing that it was insufficient to indicate a trend that would have warranted opening an investigation.

For the time period of 1990 through 1998, NHTSA's database had over 4,200 tire complaints for all tire manufacturers. These complaints cover a full range of problems, ranging from excessive vibration, premature wear, uneven wear and spare tire separations, to bonafide safety issues related to the tire's performance. Of those, 344 were Firestone complaints. Of those 344, NHTSA has identified 26 complaints that are relevant to this investigation and were received prior to July 22, 1998.

We hope you find this information helpful. If we can be of further assistance, please contact Ms. Kathleen DeMeter, of my staff at (202) 366-2850.

Sincerely,

Dr Sue Bailey

Dr. Sue Bailey

Enclosures

U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

SEP 19 2000

Mr. Bruce Gwinn
Professional Staff Member
House Committee on Commerce
Room 564, Ford House Office Building
Washington, DC 20515

Dear Mr. Gwinn:

In accordance with your request in a telephone conversation with me on September 15, 2000, I am providing you with a list of, and copies of, the 26 consumer complaints regarding Firestone ATX, ATX II, and Wilderness tires that had been received by the National Highway Traffic Safety Administration's (NHTSA) Office of Defects Investigation (ODI) prior to July 22, 1998. These complaints were referenced in the fourth paragraph of a September 6, 2000 letter from NHTSA Administrator Dr. Sue Bailey to Congressman John D. Dingell.

These complaints were identified through a search conducted by Terri Droneburg, the primary ODI engineer for the Firestone investigation, in April 2000, as part of her preparation for the formal opening of the investigation. Ms. Droneburg searched the ODI complaint database for all reports related to Firestone tires and/or tires (regardless of make) on Ford Explorers. She then reviewed each complaint summary to identify those that seemed to be within the scope of the anticipated investigation . This effort yielded 46 complaints that had been received by ODI prior to KHOU's February 7, 2000 broadcast. Of these 46, 26 had been received by ODI prior to July 22, 1998.

Pursuant to instructions from NHTSA's Office of Chief Counsel, the complainants' names and other identifying information have been redacted from the copies I am providing.

Sincerely,

Kenneth N. Weinstein
Associate Administrator
for Safety Assurance

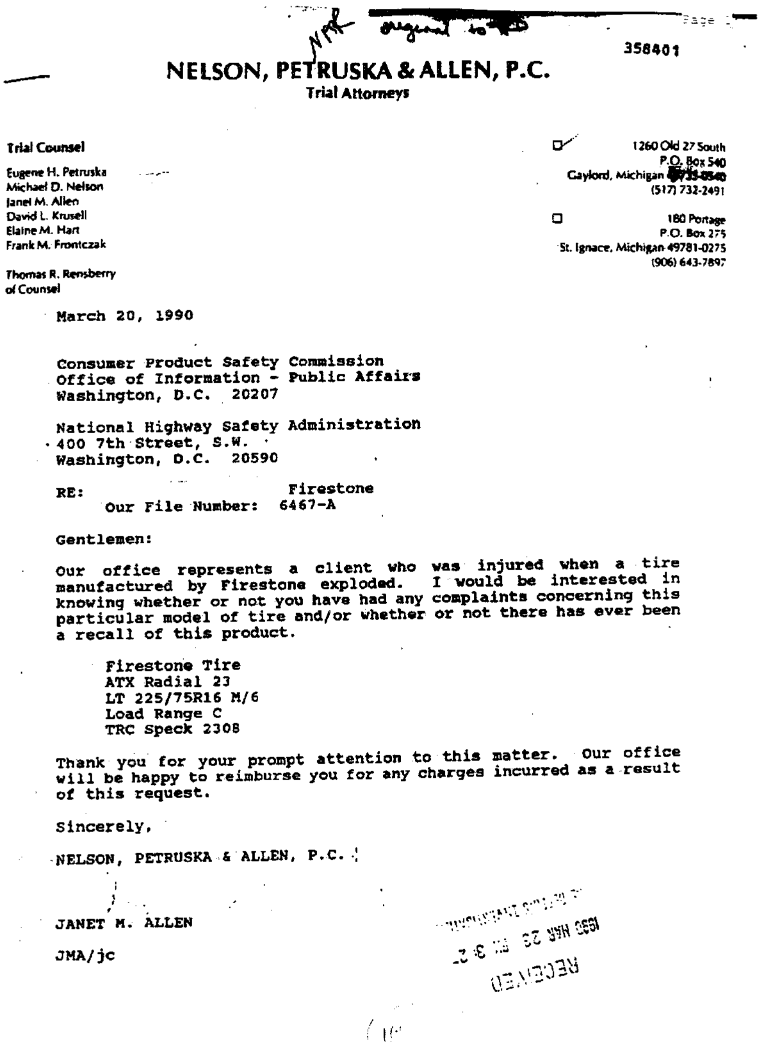
Enclosures

ODI Reports
Before July 22, 1998
Redacted

PE00-020 VOQS RECEIVED BEFORE JULY 22, 1998 - ORDERED BY REPORT DATE

VOQ Number	Report Date
358401	23-MAR-90
900281	15-MAY-90
910699	04-NOV-91
438994	23-JUL-92
445820	05-JAN-93
454957	16-APR-93
451258	21-APR-93
468113	14-FEB-94
466837	01-MAY-94
471277	27-JUN-94
951360	07-JUL-94
479429	12-DEC-94
479389	13-DEC-94
960901	28-FEB-95
966709	13-JUN-95
970341	14-AUG-95
985786	18-JUN-96
804287	20-JAN-97
519525	17-JUL-97
522641	14-AUG-97
816238	10-SEP-97
604507	12-NOV-97
822228	02-APR-98
537665	01-JUN-98
824027	08-JUN-98
608622	15-JUN-98

Count = 26



NPR original to [illegible]

Page 1

358401

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(517) 732-2491

☐ 180 Portage
P.O. Box 275
St. Ignace, Michigan 49781-0275
(906) 643-7897

March 20, 1990

Consumer Product Safety Commission
Office of Information - Public Affairs
Washington, D.C. 20207

National Highway Safety Administration
400 7th Street, S.W.
Washington, D.C. 20590

RE: Firestone
Our File Number: 6467-A

Gentlemen:

Our office represents a client who was injured when a tire manufactured by Firestone exploded. I would be interested in knowing whether or not you have had any complaints concerning this particular model of tire and/or whether or not there has ever been a recall of this product.

Firestone Tire
ATX Radial 23
LT 225/75R16 M/6
Load Range C
TRC Speck 2308

Thank you for your prompt attention to this matter. Our office will be happy to reimburse you for any charges incurred as a result of this request.

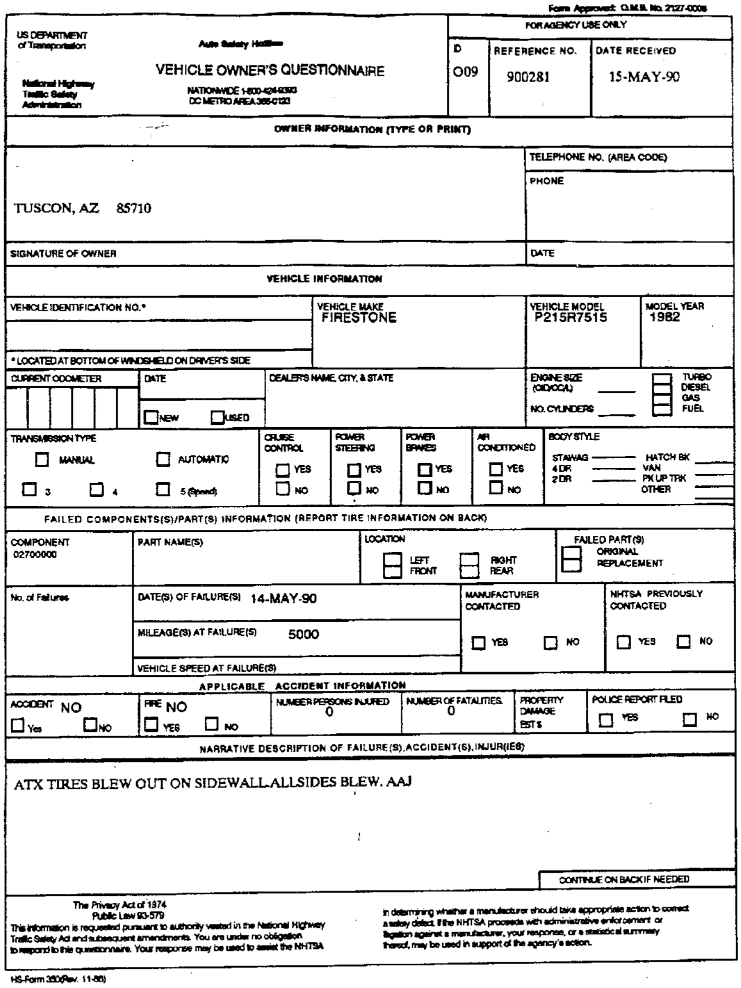
Sincerely,

NELSON, PETRUSKA & ALLEN, P.C.

JANET M. ALLEN

JMA/jc

RECEIVED
1990 MAR 23 PM 3 2



Form Approved: O.M.B. No. 2127-0008

US DEPARTMENT of Transportation
National Highway Traffic Safety Administration

Auto Safety Hotline

VEHICLE OWNER'S QUESTIONNAIRE

NATIONWIDE 1-800-424-9393
DC METRO AREA 366-0123

FOR AGENCY USE ONLY

ID	REFERENCE NO.	DATE RECEIVED
O09	900281	15-MAY-90

OWNER INFORMATION (TYPE OR PRINT)

TUSCON, AZ 85710

TELEPHONE NO. (AREA CODE)
PHONE

SIGNATURE OF OWNER
DATE

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.*
* LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE

VEHICLE MAKE FIRESTONE
VEHICLE MODEL P215R7515
MODEL YEAR 1982

CURRENT ODOMETER
DATE ☐ NEW ☐ USED
DEALER'S NAME, CITY, & STATE
ENGINE SIZE (CID/CC/L) ____
NO. CYLINDERS ____
☐ TURBO ☐ DIESEL ☐ GAS ☐ FUEL

TRANSMISSION TYPE ☐ MANUAL ☐ AUTOMATIC ☐ 3 ☐ 4 ☐ 5 (Speed)
CRUISE CONTROL ☐ YES ☐ NO
POWER STEERING ☐ YES ☐ NO
POWER BRAKES ☐ YES ☐ NO
AIR CONDITIONED ☐ YES ☐ NO
BODY STYLE STA/WAG ____ 4 DR ____ 2 DR ____ HATCH BK ____ VAN ____ PK UP TRK ____ OTHER ____

FAILED COMPONENTS(S)/PART(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT 02700000
PART NAME(S)
LOCATION ☐ LEFT ☐ FRONT ☐ RIGHT ☐ REAR
FAILED PART(S) ☐ ORIGINAL ☐ REPLACEMENT

No. of Failures
DATE(S) OF FAILURE(S) 14-MAY-90
MILEAGE(S) AT FAILURE(S) 5000
VEHICLE SPEED AT FAILURE(S)
MANUFACTURER CONTACTED ☐ YES ☐ NO
NHTSA PREVIOUSLY CONTACTED ☐ YES ☐ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT NO ☐ Yes ☐ NO
FIRE NO ☐ YES ☐ NO
NUMBER PERSONS INJURED 0
NUMBER OF FATALITIES 0
PROPERTY DAMAGE EST $
POLICE REPORT FILED ☐ YES ☐ NO

NARRATIVE DESCRIPTION OF FAILURE(S),ACCIDENT(S),INJUR(IES)

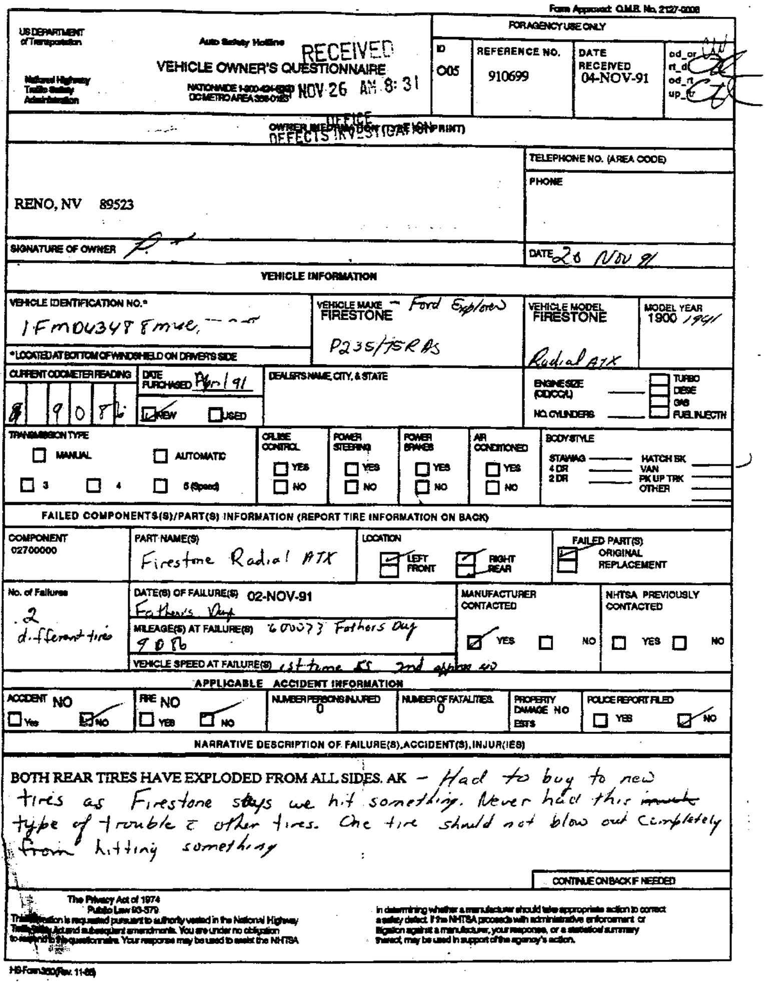
ATX TIRES BLEW OUT ON SIDEWALL.ALLSIDES BLEW. AAJ

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93-579

This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.

HS-Form 350(Rev. 11-88)



Form Approved: O.M.B. No. 2127-0008

US DEPARTMENT of Transportation
National Highway Traffic Safety Administration

Auto Safety Hotline

VEHICLE OWNER'S QUESTIONNAIRE

NATIONWIDE 1-800-424-9393
DC METRO AREA 366-0123

RECEIVED
NOV 26 AM 8:31
OFFICE
DEFECTS INVESTIGATION

FOR AGENCY USE ONLY
ID: O05
REFERENCE NO.: 910699
DATE RECEIVED: 04-NOV-91
od_or
rt_d
od_rt
up_tr

OWNER INFORMATION (TYPE OR PRINT)

RENO, NV 89523

TELEPHONE NO. (AREA CODE)
PHONE

SIGNATURE OF OWNER
DATE 20 NOV 91

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.*: 1FMDU34X8MUE, — —
*LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE
VEHICLE MAKE: FIRESTONE – Ford Explorer
P235/75R15
VEHICLE MODEL: FIRESTONE
Radial ATX
MODEL YEAR: 1900 1991
CURRENT ODOMETER READING: 9086
DATE PURCHASED: Apr/91
☑ NEW ☐ USED
DEALER'S NAME, CITY, & STATE
ENGINE SIZE (CID/CC/L) ____
NO. CYLINDERS ____
☐ TURBO ☐ DIESEL ☐ GAS ☐ FUEL INJECTN
TRANSMISSION TYPE: ☐ MANUAL ☐ AUTOMATIC ☐ 3 ☐ 4 ☐ 5 (Speed)
CRUISE CONTROL: ☐ YES ☐ NO
POWER STEERING: ☐ YES ☐ NO
POWER BRAKES: ☐ YES ☐ NO
AIR CONDITIONED: ☐ YES ☐ NO
BODY STYLE: STA/WAG ____ 4 DR ____ 2 DR ____ HATCH BK ____ VAN ____ PK UP TRK ____ OTHER ____

FAILED COMPONENTS(S)/PART(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT: 02700000
PART NAME(S): Firestone Radial ATX
LOCATION: ☑ LEFT ☐ FRONT ☑ RIGHT ☑ REAR
FAILED PART(S): ☑ ORIGINAL ☐ REPLACEMENT
No. of Failures: 2 different tires
DATE(S) OF FAILURE(S): 02-NOV-91 Father's Day
MILEAGE(S) AT FAILURE(S): 600?? Fathers Day 9086
VEHICLE SPEED AT FAILURE(S): 1st time 55 2nd approx 40
MANUFACTURER CONTACTED: ☑ YES ☐ NO
NHTSA PREVIOUSLY CONTACTED: ☐ YES ☐ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT: NO ☐ Yes ☑ NO
FIRE: NO ☐ YES ☑ NO
NUMBER PERSONS INJURED: 0
NUMBER OF FATALITIES: 0
PROPERTY DAMAGE: NO
ESTS
POLICE REPORT FILED: ☐ YES ☑ NO

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJUR(IES)

BOTH REAR TIRES HAVE EXPLODED FROM ALL SIDES. AK – Had to buy to new tires as Firestone says we hit something. Never had this ~~much~~ type of trouble c̄ other tires. One tire should not blow out completely from hitting something

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93-579
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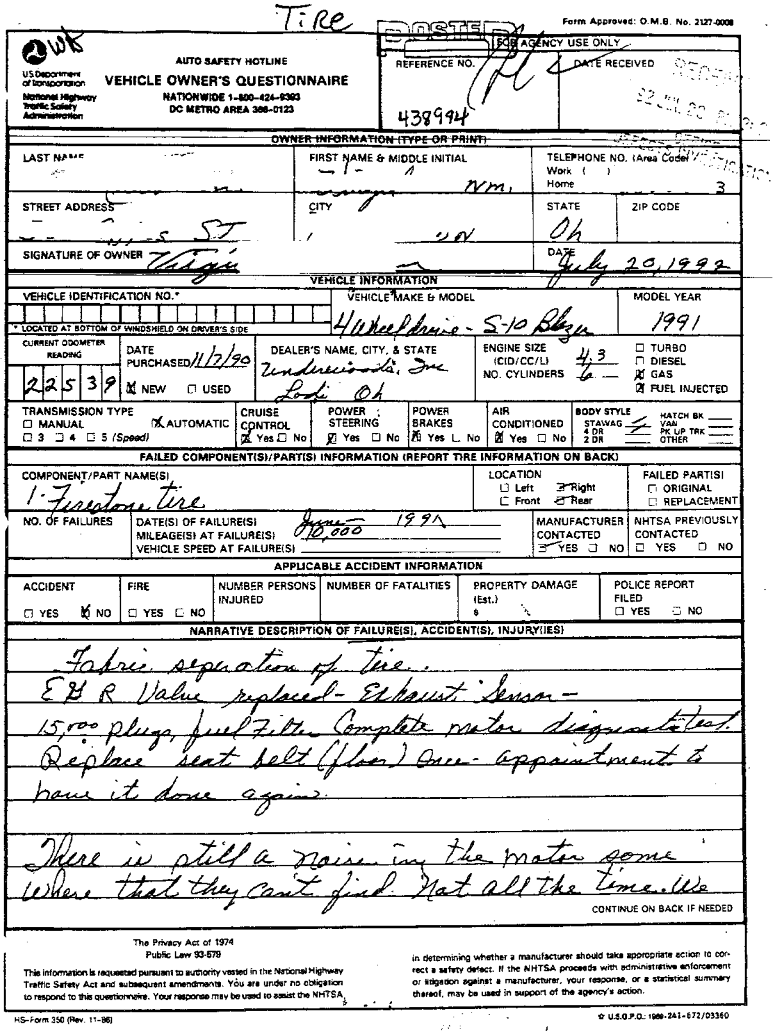
HS Form 350 (Rev. 11-88)



Tire

POSTED

Form Approved: O.M.B. No. 2127-0008

U.S. Department of Transportation
National Highway Traffic Safety Administration

AUTO SAFETY HOTLINE
VEHICLE OWNER'S QUESTIONNAIRE
NATIONWIDE 1-800-424-9393
DC METRO AREA 366-0123

FOR AGENCY USE ONLY
REFERENCE NO. 438994
DATE RECEIVED

OWNER INFORMATION (TYPE OR PRINT)

LAST NAME	FIRST NAME & MIDDLE INITIAL	TELEPHONE NO. (Area Code) Work ( ) Home	
STREET ADDRESS ST	CITY	STATE Oh	ZIP CODE
SIGNATURE OF OWNER		DATE July 20, 1992	

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.* * LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE	VEHICLE MAKE & MODEL 4 Wheel drive - S-10 Blazer	MODEL YEAR 1991	
CURRENT ODOMETER READING 22539	DATE PURCHASED 11/7/90 ☒ NEW ☐ USED	DEALER'S NAME, CITY, & STATE Underwoods, Inc Lodi Oh	ENGINE SIZE (CID/CC/L) 4.3 NO. CYLINDERS 6 ☐ TURBO ☐ DIESEL ☒ GAS ☒ FUEL INJECTED

TRANSMISSION TYPE ☐ MANUAL ☒ AUTOMATIC ☐ 3 ☐ 4 ☐ 5 (Speed)	CRUISE CONTROL ☒ Yes ☐ No	POWER STEERING ☒ Yes ☐ No	POWER BRAKES ☒ Yes ☐ No	AIR CONDITIONED ☒ Yes ☐ No	BODY STYLE STAWAG 4 DR ✓ 2 DR HATCH BK VAN PK UP TRK OTHER

FAILED COMPONENT(S)/PART(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT/PART NAME(S) 1 - Firestone tire		LOCATION ☐ Left ☒ Right ☐ Front ☒ Rear	FAILED PART(S) ☐ ORIGINAL ☐ REPLACEMENT
NO. OF FAILURES	DATE(S) OF FAILURE(S) June 1991 MILEAGE(S) AT FAILURE(S) 10,000 VEHICLE SPEED AT FAILURE(S)	MANUFACTURER CONTACTED ☒ YES ☐ NO	NHTSA PREVIOUSLY CONTACTED ☐ YES ☐ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT ☐ YES ☒ NO	FIRE ☐ YES ☐ NO	NUMBER PERSONS INJURED	NUMBER OF FATALITIES	PROPERTY DAMAGE (Est.) $	POLICE REPORT FILED ☐ YES ☐ NO

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJURY(IES)

Fabric separation of tire.
EGR Valve replaced - Exhaust Sensor -
15,000 plugs, fuel Filter Complete motor diagnostic test.
Replace seat belt (floor) once - appointment to
have it done again.

There is still a noise in the motor some
where that they can't find. Not all the time. We

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93-579

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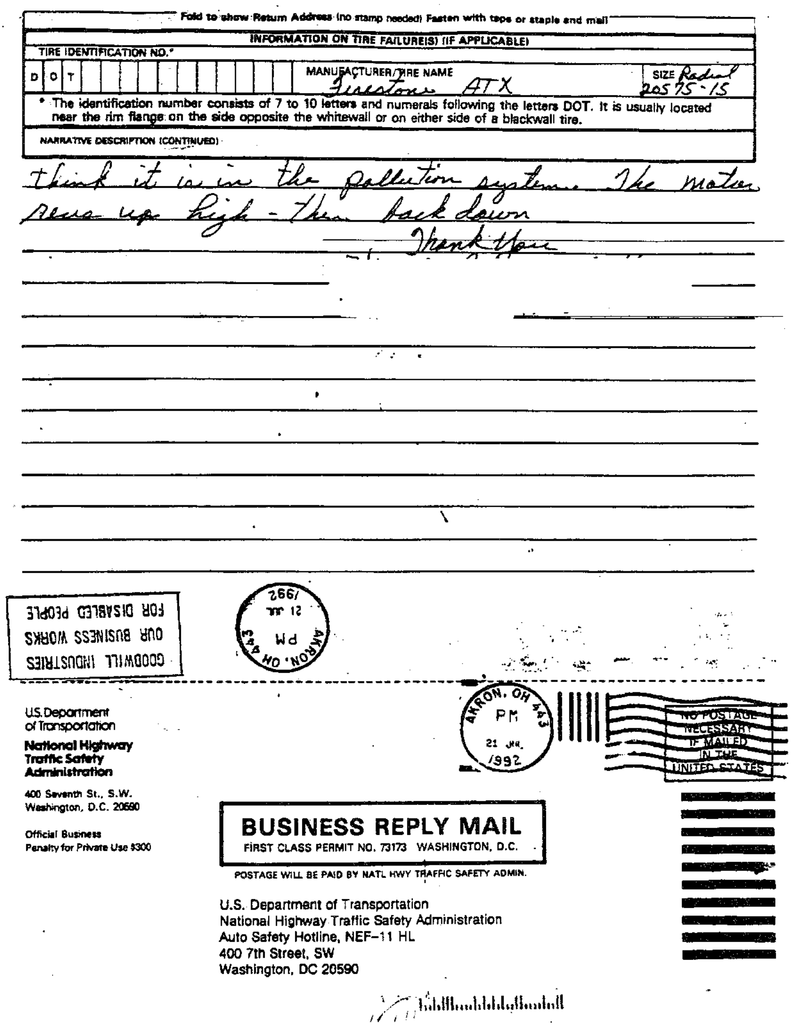
HS-Form 350 (Rev. 11-86)

U.S.G.P.O.: 1989-241-672/03360



Fold to show Return Address (no stamp needed) Fasten with tape or staple and mail

INFORMATION ON TIRE FAILURE(S) (IF APPLICABLE)

TIRE IDENTIFICATION NO.*

D O T

MANUFACTURER/TIRE NAME Firestone ATX

SIZE Radial 205 75-15

* The identification number consists of 7 to 10 letters and numerals following the letters DOT. It is usually located near the rim flange on the side opposite the whitewall or on either side of a blackwall tire.

NARRATIVE DESCRIPTION (CONTINUED)

think it is in the pollution system. The motor revs up high - Then back down

Thank You

GOODWILL INDUSTRIES
OUR BUSINESS WORKS
FOR DISABLED PEOPLE

AKRON, OH 443
PM
21 JUL
1992

U.S. Department of Transportation
National Highway Traffic Safety Administration

400 Seventh St., S.W.
Washington, D.C. 20590

Official Business
Penalty for Private Use $300

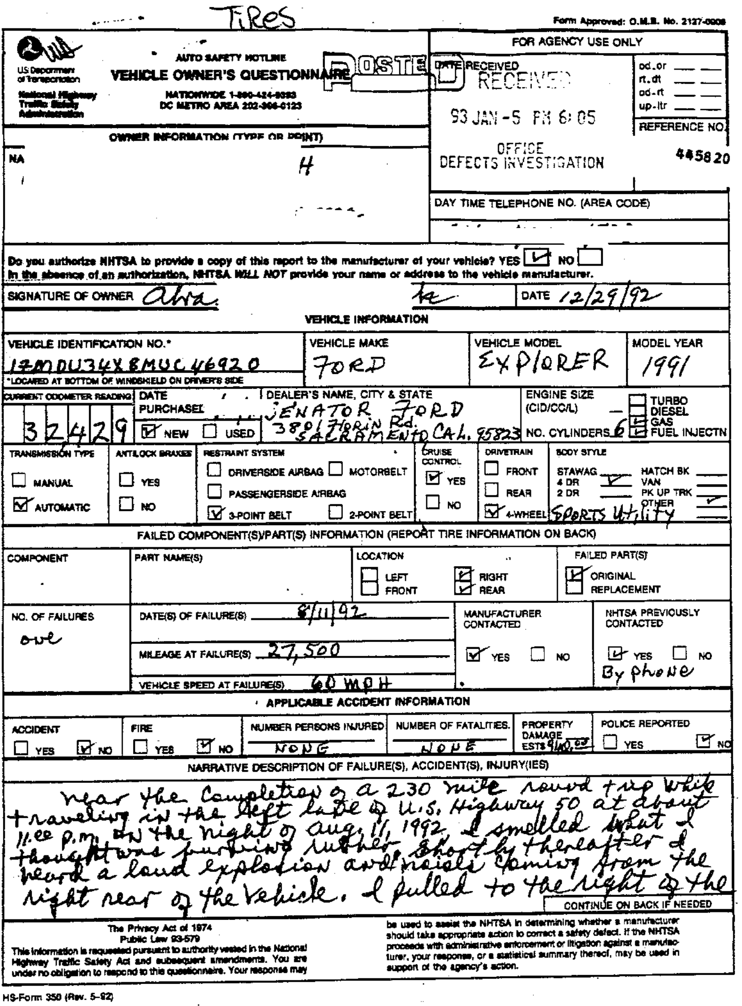
AKRON, OH 443
PM
21 JUL
1992

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 73173 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY NATL HWY TRAFFIC SAFETY ADMIN.

U.S. Department of Transportation
National Highway Traffic Safety Administration
Auto Safety Hotline, NEF-11 HL
400 7th Street, SW
Washington, DC 20590



TIRES

Form Approved: O.M.B. No. 2127-0008

U.S. Department of Transportation
National Highway Traffic Safety Administration

AUTO SAFETY HOTLINE
VEHICLE OWNER'S QUESTIONNAIRE
NATIONWIDE 1-800-424-9393
DC METRO AREA 202-366-0123

POSTED

FOR AGENCY USE ONLY

DATE RECEIVED
RECEIVED
93 JAN -5 PM 6:05
OFFICE
DEFECTS INVESTIGATION

od.or ___ ___
rt.dt ___ ___
od-rt ___ ___
up-ltr ___ ___

REFERENCE NO.
445820

OWNER INFORMATION (TYPE OR PRINT)

NA
H

DAY TIME TELEPHONE NO. (AREA CODE)

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☑ NO ☐
In the absence of an authorization, NHTSA WILL NOT provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER alva
DATE 12/29/92

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.* 1FMDU34X8MUC46920 *LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE	VEHICLE MAKE FORD	VEHICLE MODEL EXPLORER	MODEL YEAR 1991

CURRENT ODOMETER READING 32429	DATE PURCHASED ☑ NEW ☐ USED	DEALER'S NAME, CITY & STATE SENATOR FORD 3801 Florin Rd. SACRAMENTO CAL. 95823	ENGINE SIZE (CID/CC/L) — NO. CYLINDERS 6 ☐ TURBO ☐ DIESEL ☑ GAS ☑ FUEL INJECTN

TRANSMISSION TYPE ☐ MANUAL ☑ AUTOMATIC	ANTILOCK BRAKES ☐ YES ☐ NO	RESTRAINT SYSTEM ☐ DRIVERSIDE AIRBAG ☐ MOTORBELT ☐ PASSENGERSIDE AIRBAG ☑ 3-POINT BELT ☐ 2-POINT BELT	CRUISE CONTROL ☑ YES ☐ NO	DRIVETRAIN ☐ FRONT ☐ REAR ☑ 4-WHEEL	BODY STYLE STAWAG ___ HATCH BK ___ 4 DR ✓ VAN ___ 2 DR ___ PK UP TRK ___ OTHER ✓ SPORTS Utility

FAILED COMPONENT(S)/PART(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT	PART NAME(S)	LOCATION ☐ LEFT ☑ RIGHT ☐ FRONT ☑ REAR	FAILED PART(S) ☑ ORIGINAL ☐ REPLACEMENT

NO. OF FAILURES one	DATE(S) OF FAILURE(S) 8/11/92 MILEAGE AT FAILURE(S) 27,500 VEHICLE SPEED AT FAILURE(S) 60 MPH	MANUFACTURER CONTACTED ☑ YES ☐ NO	NHTSA PREVIOUSLY CONTACTED ☑ YES ☐ NO By phone

APPLICABLE ACCIDENT INFORMATION

ACCIDENT ☐ YES ☑ NO	FIRE ☐ YES ☑ NO	NUMBER PERSONS INJURED NONE	NUMBER OF FATALITIES. NONE	PROPERTY DAMAGE EST$ 910.00	POLICE REPORTED ☐ YES ☑ NO

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJURY(IES)

near the Completion of a 230 mile round trip while
traveling in the left lane of U.S. Highway 50 at about
11.00 p.m. on the night of aug. 11, 1992 I smelled what I
thought was burning rubber. Shortly thereafter I
heard a loud explosion and noise coming from the
right rear of the vehicle. I pulled to the right of the

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93-579
This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.

HS-Form 350 (Rev. 5-92)

Fold to show Return Address (no stamp needed) Fasten with tape or staple and mail

INFORMATION ON TIRE FAILURE(S) (IF APPLICABLE)

TIRE IDENTIFICATION NO.*

D O T W2 HL 1 M 0470

MANUFACTURER/TIRE NAME: FIRESTONE RADIAL ATX

SIZE: P235-75R 15

* The identification number consists of 7 to 10 letters and numerals following the letters DOT. It is usually located near the rim flange on the side opposite the whitewall or on either side of a blackwall tire.

NARRATIVE DESCRIPTION (CONTINUED)

roadway and there I saw the R.R tire deflated Casing with the tread missing, upon further inspection I located the tread as seen in the enclosed photograph about 50 feet in front of the vehicle. More Observations revealed a broken right taillight component, dents and scratches on the side of the vehicle, separation of the tread of the tire from the casing and scratches and dented hub cap.

☆ U.S. G.P.O.: 1992 – 623-897 / 60086

U.S. Department
of Transportation
National Highway
Traffic Safety
Administration

400 Seventh St., S.W.
Washington, D.C. 20590

Official Business
Penalty for Private Use $300

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 73173 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY NATL HWY TRAFFIC SAFETY ADMIN.

U.S. Department of Transportation
National Highway Traffic Safety Administration
Auto Safety Hotline, NEF-11 HL
400 7th Street, SW
Washington, DC 20590

Firestone

FIRESTONE TECHNICAL SERVICE CENTER
BRIDGESTONE/FIRESTONE, INC.
930 East 233rd Street
Carson, California 90745
Phone: (310) 834-5828
Facsimile No. 1-213-834-2155

August 12, 1992

Dear Mr. :

We are writing to follow up your earlier telephone conversation concerning your claim involving a Firestone tire.

To enable us to process your claim for consideration, ship the tire, ground delivery, freight prepaid, (ie. UPS/Federal Express), along with the following information to Technical Services Manager, (Address): Bridgestone/Firestone, Inc., 930 East 233rd St., Carson, CA 90745:

1. Photographs of the damage to your vehicle. ✓
2. Two (2) estimates of the damage.
3. Statement from you explaining the incident, including the date of loss, location and details of the incident, names of the passengers, vehicle owner's name and address and details of owners of other vehicles if there was more than one vehicle in the incident. (The attached "Incident Report" may be of assistance).
4. Police report if one was prepared.
5. Details concerning your insurance company (name of company, representative to contact, amount paid by the company, etc.) if an insurance company is involved.
6. If a replacement tire has been purchased, please furnish proof of purchase, such as a copy of the invoice.

Thank you for your cooperation. If you have any questions, please do not hesitate to call 1-800-356-4644.

Very truly yours,

Claim Processing

BRIDGESTONE/FIRESTONE, INC.

One Bridgestone Park
P.O. Box 140991
Nashville, Tennessee 37214-0991
Phone: (615) 391-0088
Fax No.: (615) 872-2621

September 28, 1992
Ref. No.: 921147

Sacramento, CA 95822

SUBJECT: INSPECTION OF TIRE

Dear Mr. McIntosh:

Our Carson, California office has received your Firestone tire (RADATX, 235/75R15) and it has been inspected by our Technical Service Manager.

In the course of that non-destructive inspection, no defects or irregularities in workmanship or materials were observed.

We did observe a nail hole puncture on the tire shoulder that apparently had an improper repair. This repair material, which has been forced from the tire, allowed internal air pressure to leak out, as well as seep into the tire elements, resulting in a run low condition and subsequent tread/belt detachment.

While we regret that you have had this difficulty, we have concluded, on the basis of our inspection, that the damage to the tire was use related. Accordingly, we must respectfully deny your request for compensation. You may consider turning this incident over to your vehicle insurance provider for their consideration and possible compensation.

If you would like your tire returned, freight collect, please mail the attached tire return letter to Bridgestone within thirty (30) days from the date of this letter. If we have not heard from you within the thirty (30) day period, we will dispose of the tire.

Very truly yours,

John A. Ruys

John A. Ruys
Claims Processor

JAR/tc

Bridgestone/Firestone, Inc.
One Bridgestone Park
P.O. Box 140991
Nashville, TN 37214-0991
Attention: Legal Department

Re: Tire Return

Dear Sirs:

Please return the tire submitted to Bridgestone and referred to in Bridgestone's letter to me, Abraham McIntosh, dated September 28, 1992.

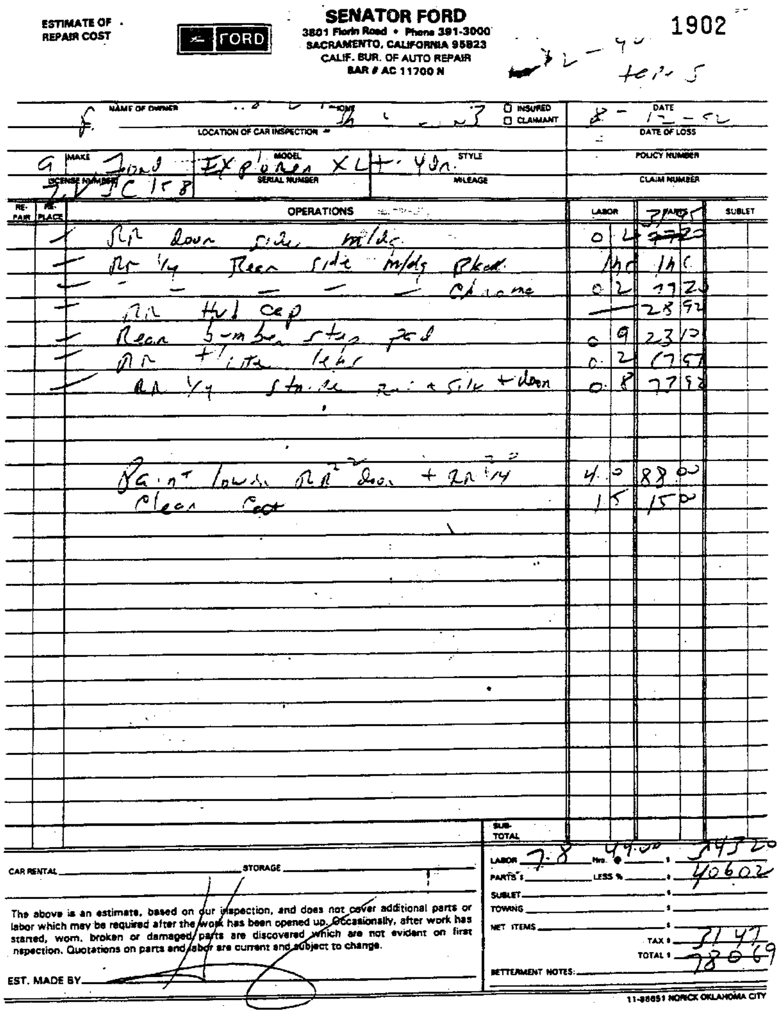
I am requesting the tire be shipped "Freight Collect" to:

Name:
Address:
City: S 35822
Carrier Preference: United PARCEL Service

(If none stated, Bridgestone may ship via carrier of their choice.)

Signature: Date: 10/15/92

12/29/92
- Though I requested by mailing this form to Firestone on 10/15/92, I have yet to receive my tire.



ESTIMATE OF
REPAIR COST

SENATOR FORD
3801 Florin Road • Phone 391-3000
SACRAMENTO, CALIFORNIA 95823
CALIF. BUR. OF AUTO REPAIR
BAR # AC 11700 N

1902

[illegible]

NAME OF OWNER	☐ INSURED ☐ CLAIMANT	DATE 8-17-92
LOCATION OF CAR INSPECTION		DATE OF LOSS
9 MAKE Ford	MODEL Explorer XLT 4 Dr.	STYLE
LICENSE NUMBER [illegible]C158	SERIAL NUMBER	MILEAGE
POLICY NUMBER		
CLAIM NUMBER		

RE-PAIR	RE-PLACE	OPERATIONS	LABOR	PARTS	SUBLET
	✓	RR door side mldg	0.4	~~47 72~~ 37 95	
	✓	RR 1/4 Rear side mldg Pked	Inc	Inc	
	✓	- - - - - Chrome	0.2	77 20	
	✓	RR Hub cap	—	28 92	
	✓	Rear bumper step pad	0.9	23 10	
	✓	RR tail lite lens	0.2	17 57	
	✓	RR 1/4 stripe [illegible] + side + door	0.8	77 92	
		Paint lower RR door + RR 1/4	4.0	88 00	
		Clear coat	1.5	15 00	

SUB-TOTAL

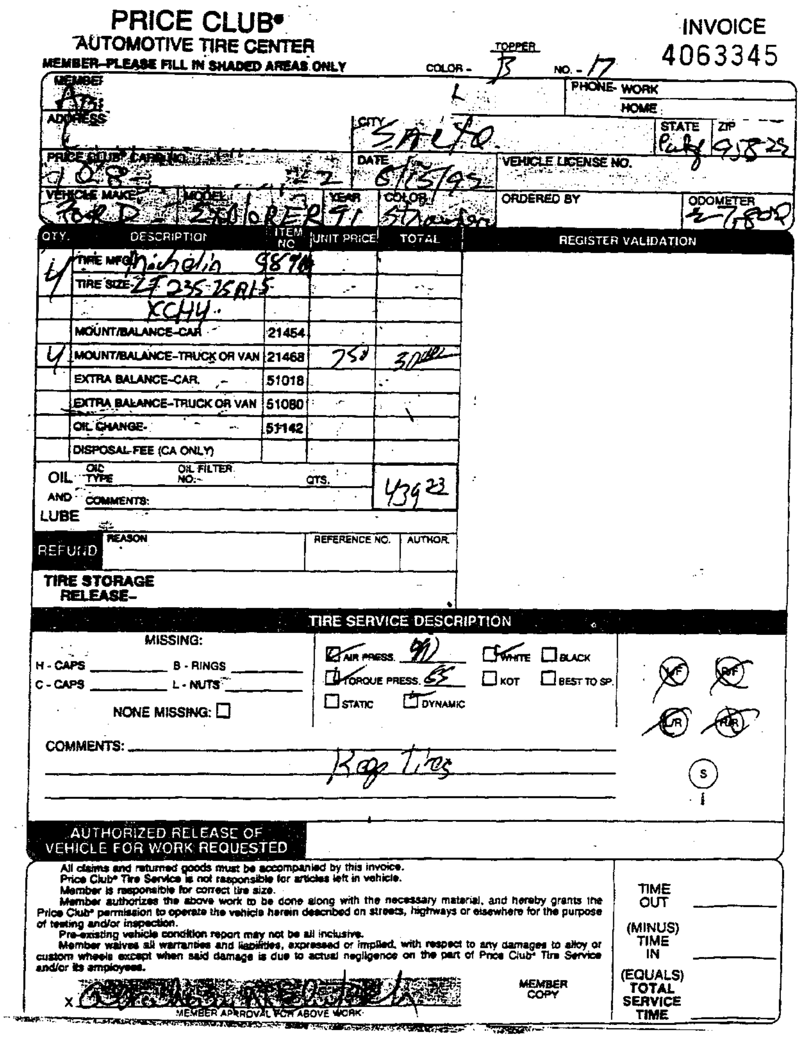
CAR RENTAL ________ STORAGE ________

The above is an estimate, based on our inspection, and does not cover additional parts or labor which may be required after the work has been opened up. Occasionally, after work has started, worn, broken or damaged parts are discovered which are not evident on first inspection. Quotations on parts and labor are current and subject to change.

EST. MADE BY ________

LABOR 7.8 Hrs. @ 44.00 $ 343 20
PARTS $ ________ LESS % ________ $ 406 02
SUBLET ________ $
TOWING ________ $
NET ITEMS ________ $
TAX $ 31 47
TOTAL $ 780 69
BETTERMENT NOTES:

11-88651 NORICK OKLAHOMA CITY



PRICE CLUB®
AUTOMOTIVE TIRE CENTER
MEMBER–PLEASE FILL IN SHADED AREAS ONLY

COLOR - TOPPER B NO. - 17

INVOICE 4063345

MEMBER: [redacted]
PHONE- WORK
HOME
ADDRESS: [redacted]
CITY: SAC.
STATE: Calif
ZIP: 95825
PRICE CLUB® CARD NO.: 108 [redacted] 2
DATE: 6/15/95
VEHICLE LICENSE NO.
VEHICLE MAKE: FORD
MODEL: EXPLORER
YEAR: 91
COLOR: Strawberry
ORDERED BY
ODOMETER: 27,802

QTY.	DESCRIPTION	ITEM NO	UNIT PRICE	TOTAL
4	TIRE MFG. Michelin 9890			
	TIRE SIZE LT 235 75R15			
	XCHY.			
	MOUNT/BALANCE–CAR	21454		
4	MOUNT/BALANCE–TRUCK OR VAN	21468	750	30.00
	EXTRA BALANCE–CAR.	51018		
	EXTRA BALANCE–TRUCK OR VAN	51080		
	OIL CHANGE-	51142		
	DISPOSAL FEE (CA ONLY)			

OIL AND LUBE
OIL TYPE OIL FILTER NO.:- QTS. 439.23
COMMENTS:

REGISTER VALIDATION

REFUND REASON REFERENCE NO. AUTHOR.

TIRE STORAGE RELEASE–

TIRE SERVICE DESCRIPTION

MISSING:
H - CAPS ______ B - RINGS ______
C - CAPS ______ L - NUTS ______
NONE MISSING: ☐

☑ AIR PRESS. 40
☑ TORQUE PRESS. 65
☐ STATIC ☑ DYNAMIC
☑ WHITE ☐ BLACK
☐ KOT ☐ BEST TO SP.

L/F R/F L/R R/R S

COMMENTS: Keep Tires

AUTHORIZED RELEASE OF VEHICLE FOR WORK REQUESTED

All claims and returned goods must be accompanied by this invoice.
Price Club® Tire Service is not responsible for articles left in vehicle.
Member is responsible for correct tire size.
Member authorizes the above work to be done along with the necessary material, and hereby grants the Price Club® permission to operate the vehicle herein described on streets, highways or elsewhere for the purpose of testing and/or inspection.
Pre-existing vehicle condition report may not be all inclusive.
Member waives all warranties and liabilities, expressed or implied, with respect to any damages to alloy or custom wheels except when said damage is due to actual negligence on the part of Price Club® Tire Service and/or its employees.

X [redacted]
MEMBER APPROVAL FOR ABOVE WORK

MEMBER COPY

TIME OUT ______
(MINUS) TIME IN ______
(EQUALS) TOTAL SERVICE TIME ______

October 20, 1992

The President
FORD MOTOR COMPANY
P.O. Box 1996
Dearborn, MI 48121

Dear Mr. President,

I am sending you this letter and the enclosed documents the most important being the identification of the tire picture; Firestone Radial ATXP235-75R-15 SL531JBOO6R DOT-W2HL1M0170 for a number of reasons. First, because I believe the tire in question and the series of tire in question may be grossly defective. If you follow the theory of the examining technician, you will find that the conclusion is illogical and prove my observation to be correct. The technician contends that the seepage of air from an incorrectly inserted plug caused the separation of the casing from the tread. I wonder and so I would surmise, and that any group of people would surmise, that it would be difficult for a tire with less than 26 pounds of air pressure per square inch could seep through an opening of that size and build up enough pressure to completely separate the casing from the tread as seen in the enclosed photograph. Please take notice that this same type of occurrence can be found in the separation of the tread from the casing in recapped tires.

Secondly, I would feel badly if other defective tires in this series have resulted in death, pain, suffering and or major disabilities and I had failed to bring this matter to your attention.

Thirdly, a fine vehicle like the Explorer, which I purchased January 31, 1991, from Senator Ford in Sacramento, in honor of the birth of my first grandchild, deserves better. The vehicle has provided me excellent, worry-free service and transportation for the first 29,000 miles, though from the tone of the letter I received from the tire dealer my feelings have drastically changed.

Fourthly, I was greatly concerned by the paucity of steel wire attaching the tread to the casing. Also, I question the epoxy that bound the casing to the tread.

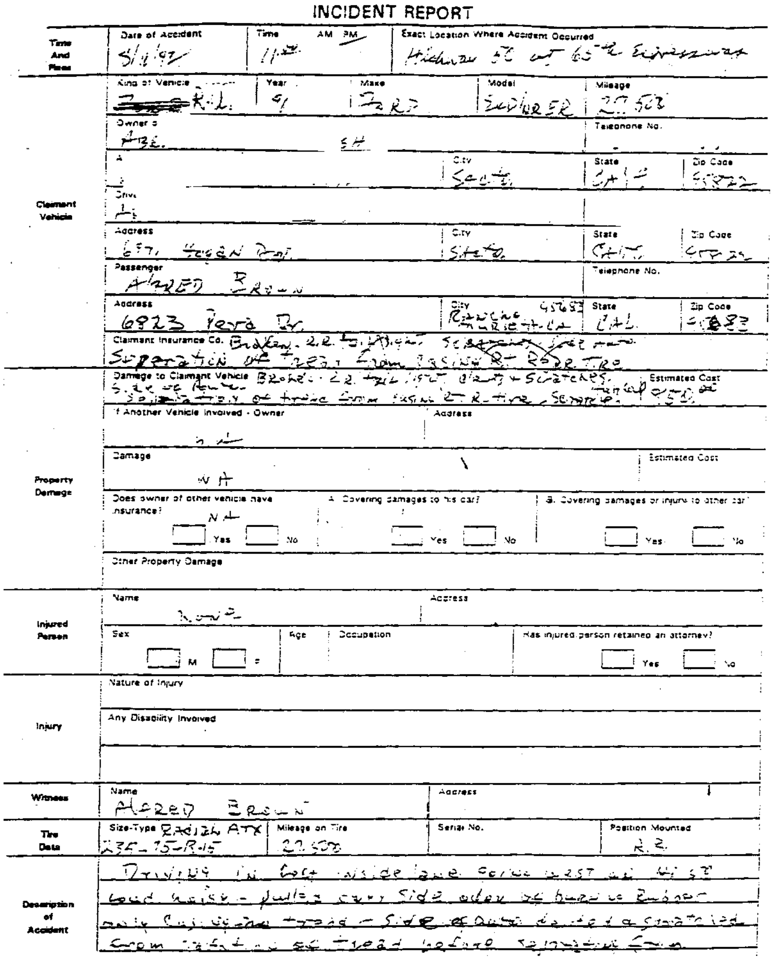
Fifthly, I wonder why Ford Motor Company would secure a tire that was not in the top three and place it on the most popular sports utility vehicle in the nation.

Sixthly, it baffles me that the explosion I heard from the blow-out of the tire could come from a PSI of less than 26 and could be great enough to rip a hole one (1) foot long more or less in the casing and separate in its entirety the tread from the casing

Finally, I hope that you will take these concerns into consideration and fully evaluate the soundness of this piece of equipment. I patiently await your reply.

Very truly yours,

cc: Senator Ford
Dept. of Transportation
Dept. of Consumers Affairs
Ralph Nader
Firestone Inc.



INCIDENT REPORT

Time And Place

Date of Accident: 5/4/92
Time: 11 AM [✓ PM]
Exact Location Where Accident Occurred: Highway 52 at 65th Expressway

Claimant Vehicle

Kind of Vehicle: ~~[illegible]~~ R.V.
Year: 91
Make: Ford
Model: Explorer
Mileage: 27,503
Owner's: Abe. [illegible]
Telephone No.:
Address:
City: Santa [illegible]
State: Calif
Zip Code: [illegible]
Driver: A [illegible]
Address: 677 [illegible] Dr.
City: [illegible]
State: Calif
Zip Code: [illegible]
Passenger: Alfred Brown
Telephone No.:
Address: 6823 [illegible] Dr.
City: Rancho [illegible] 45683
State: CAL
Zip Code: [illegible]
Claimant Insurance Co.: Broken 2.2. tail light ~~scratches~~ [illegible] Separation of tread from casing R-Rear tire

Property Damage

Damage to Claimant Vehicle: Broken 2 2 tail light, dents + scratches. side of fender, Separation of tread from casing on R-tire. Separate [illegible]
Estimated Cost: [illegible] 950.00
If Another Vehicle Involved - Owner: N/A
Address:
Damage: N/A
Estimated Cost:
Does owner of other vehicle have insurance? N/A ☐ Yes ☐ No
A. Covering damages to his car? ☐ Yes ☐ No
B. Covering damages or injury to other car? ☐ Yes ☐ No
Other Property Damage:

Injured Person

Name: None
Address:
Sex: ☐ M ☐ F
Age:
Occupation:
Has injured person retained an attorney? ☐ Yes ☐ No

Injury

Nature of Injury:
Any Disability Involved:

Witness

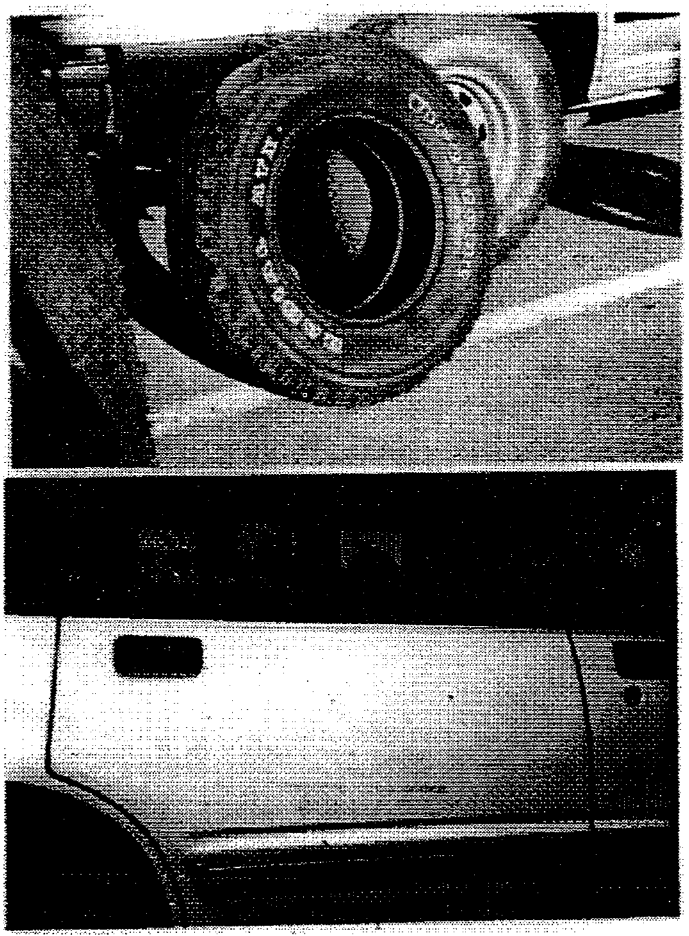
Name: Alfred Brown
Address:

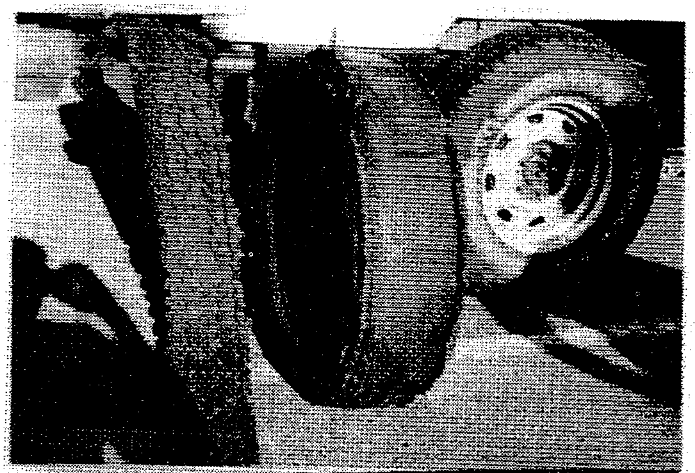
Tire Data

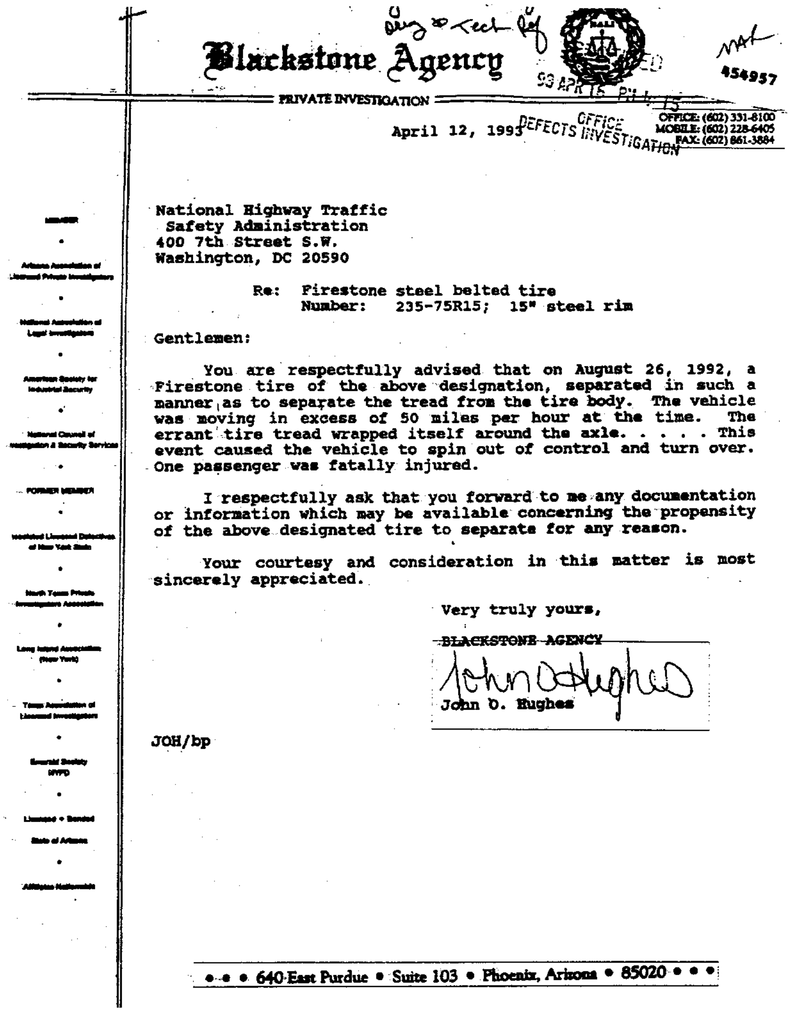
Size-Type: Radial ATX 235-75-R-15
Mileage on Tire: 27,503
Serial No.:
Position Mounted: R.R.

Description of Accident

Driving in left inside lane going west on Hi 52
Loud noise - pulled over side [illegible] of [illegible] Rubber
[illegible] tread - Side of auto dented & scratched
from [illegible] of tread before [illegible]







Orig to Tech Ref

Blackstone Agency

PRIVATE INVESTIGATION

OFFICE: (602) 331-8100
MOBILE: (602) 228-6405
FAX: (602) 861-3884

MAL

454957

ED
93 APR 15 PM 4: 15
OFFICE
DEFECTS INVESTIGATION

April 12, 1993

MEMBER
•
Arizona Association of Licensed Private Investigators
•
National Association of Legal Investigators
•
American Society for Industrial Security
•
National Council of Investigation & Security Services
•
FORMER MEMBER
•
Associated Licensed Detectives of New York State
•
North Texas Private Investigators Association
•
Long Island Association (New York)
•
Texas Association of Licensed Investigators
•
Emerald Society NYPD
•
Licensed • Bonded
State of Arizona
•
Affiliates Nationwide

National Highway Traffic
 Safety Administration
400 7th Street S.W.
Washington, DC 20590

Re: Firestone steel belted tire
Number: 235-75R15; 15" steel rim

Gentlemen:

You are respectfully advised that on August 26, 1992, a Firestone tire of the above designation, separated in such a manner as to separate the tread from the tire body. The vehicle was moving in excess of 50 miles per hour at the time. The errant tire tread wrapped itself around the axle. . . . . This event caused the vehicle to spin out of control and turn over. One passenger was fatally injured.

I respectfully ask that you forward to me any documentation or information which may be available concerning the propensity of the above designated tire to separate for any reason.

Your courtesy and consideration in this matter is most sincerely appreciated.

Very truly yours,

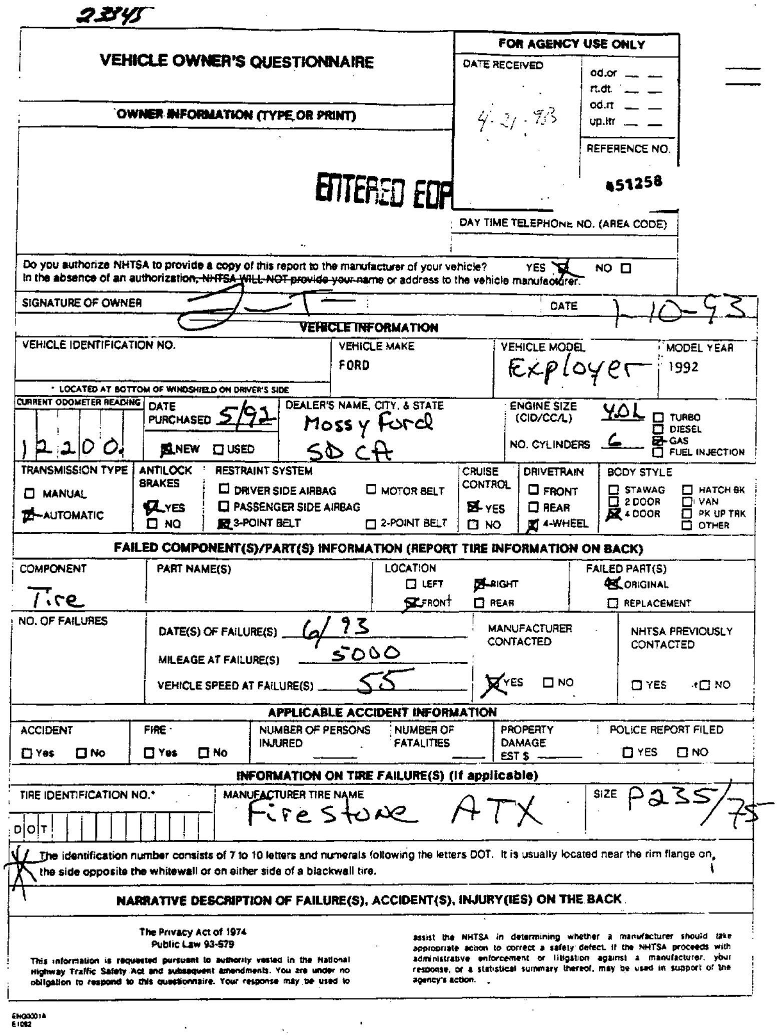
~~BLACKSTONE AGENCY~~

John O. Hughes

John O. Hughes

JOH/bp

• • • 640 East Purdue • Suite 103 • Phoenix, Arizona • 85020 • • •



2345

VEHICLE OWNER'S QUESTIONNAIRE

FOR AGENCY USE ONLY

DATE RECEIVED 4-21-93

od.or __ __
rt.dt. __ __
od.rt __ __
up.ltr __ __

REFERENCE NO. 451258

OWNER INFORMATION (TYPE OR PRINT)

ENTERED EOP

DAY TIME TELEPHONE NO. (AREA CODE)

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☒ NO ☐
In the absence of an authorization, NHTSA WILL NOT provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER DATE 1-10-93

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.
* LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE

VEHICLE MAKE FORD

VEHICLE MODEL Exployer

MODEL YEAR 1992

CURRENT ODOMETER READING 12200.

DATE PURCHASED 5/92
☒ NEW ☐ USED

DEALER'S NAME, CITY, & STATE Mossy Ford SD CA

ENGINE SIZE (CID/CC/L) 4.0L
NO. CYLINDERS 6
☐ TURBO
☐ DIESEL
☒ GAS
☐ FUEL INJECTION

TRANSMISSION TYPE ☐ MANUAL ☒ AUTOMATIC

ANTILOCK BRAKES ☒ YES ☐ NO

RESTRAINT SYSTEM ☐ DRIVER SIDE AIRBAG ☐ MOTOR BELT ☐ PASSENGER SIDE AIRBAG ☒ 3-POINT BELT ☐ 2-POINT BELT

CRUISE CONTROL ☒ YES ☐ NO

DRIVETRAIN ☐ FRONT ☐ REAR ☒ 4-WHEEL

BODY STYLE ☐ STAWAG ☐ 2 DOOR ☒ 4 DOOR ☐ HATCH BK ☐ VAN ☐ PK UP TRK ☐ OTHER

FAILED COMPONENT(S)/PART(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT Tire

PART NAME(S)

LOCATION ☐ LEFT ☒ RIGHT ☒ FRONT ☐ REAR

FAILED PART(S) ☒ ORIGINAL ☐ REPLACEMENT

NO. OF FAILURES

DATE(S) OF FAILURE(S) 6/93
MILEAGE AT FAILURE(S) 5000
VEHICLE SPEED AT FAILURE(S) 55

MANUFACTURER CONTACTED ☒ YES ☐ NO

NHTSA PREVIOUSLY CONTACTED ☐ YES ☐ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT ☐ Yes ☐ No

FIRE ☐ Yes ☐ No

NUMBER OF PERSONS INJURED ____

NUMBER OF FATALITIES ____

PROPERTY DAMAGE EST $ ____

POLICE REPORT FILED ☐ YES ☐ NO

INFORMATION ON TIRE FAILURE(S) (if applicable)

TIRE IDENTIFICATION NO.* D O T

MANUFACTURER TIRE NAME Firestone ATX

SIZE P235/75

* The identification number consists of 7 to 10 letters and numerals following the letters DOT. It is usually located near the rim flange on the side opposite the whitewall or on either side of a blackwall tire.

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJURY(IES) ON THE BACK

The Privacy Act of 1974
Public Law 93-579

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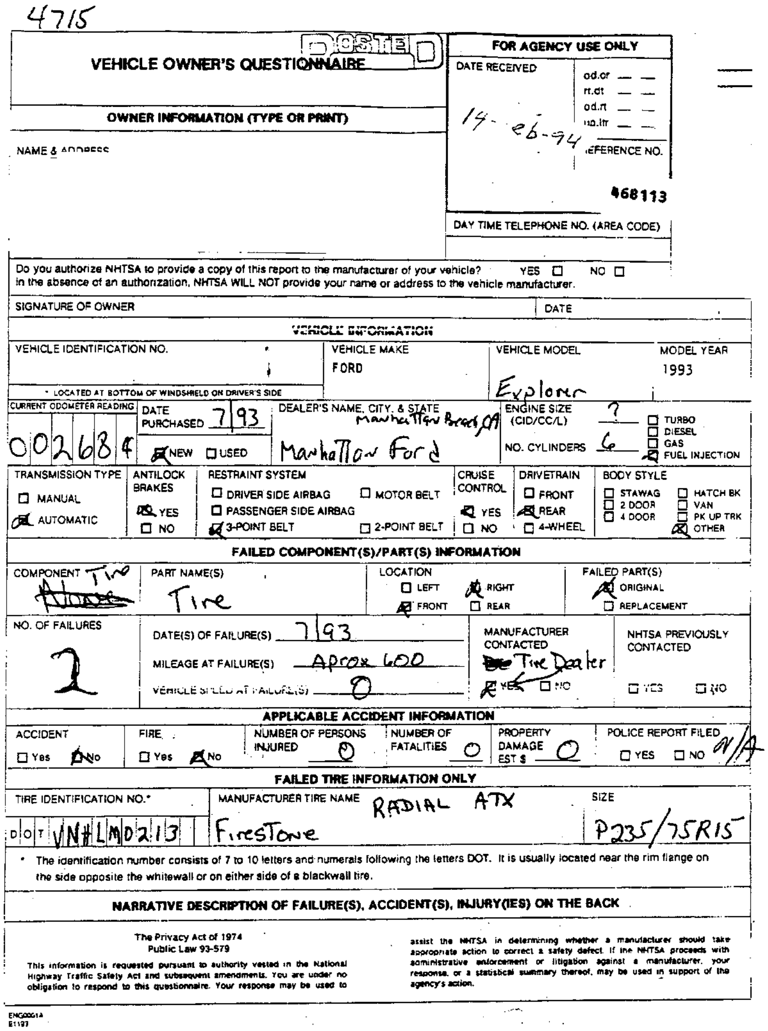
SHG0001A
E1082

Right front tire blew out at 5,000 miles - Ford said "Tough Luck" tires are not covered under warranty. so much for 2 year bumper to bumber

Leo



4715

POSTED

VEHICLE OWNER'S QUESTIONNAIRE

FOR AGENCY USE ONLY

DATE RECEIVED 14-eb-94

od.or — —
rt.dt — —
od.rt — —
no.ltr — —

REFERENCE NO. 468113

OWNER INFORMATION (TYPE OR PRINT)

NAME & ADDRESS

DAY TIME TELEPHONE NO. (AREA CODE)

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☐ NO ☐
In the absence of an authorization, NHTSA WILL NOT provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER

DATE

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.*
* LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE

VEHICLE MAKE: FORD

VEHICLE MODEL: Explorer

MODEL YEAR: 1993

CURRENT ODOMETER READING: 002684

DATE PURCHASED: 7 93

☒ NEW ☐ USED

DEALER'S NAME, CITY, & STATE: Manhattan Ford Manhattan Beach CA

ENGINE SIZE (CID/CC/L): ?

NO. CYLINDERS: 6

☐ TURBO
☐ DIESEL
☐ GAS
☒ FUEL INJECTION

TRANSMISSION TYPE: ☐ MANUAL ☒ AUTOMATIC

ANTILOCK BRAKES: ☒ YES ☐ NO

RESTRAINT SYSTEM: ☐ DRIVER SIDE AIRBAG ☐ MOTOR BELT ☐ PASSENGER SIDE AIRBAG ☒ 3-POINT BELT ☐ 2-POINT BELT

CRUISE CONTROL: ☒ YES ☐ NO

DRIVETRAIN: ☐ FRONT ☒ REAR ☐ 4-WHEEL

BODY STYLE: ☐ STAWAG ☐ 2 DOOR ☐ 4 DOOR ☐ HATCH BK ☐ VAN ☐ PK UP TRK ☒ OTHER

FAILED COMPONENT(S)/PART(S) INFORMATION

COMPONENT: Tire ~~None~~

PART NAME(S): Tire

LOCATION: ☐ LEFT ☒ RIGHT ☒ FRONT ☐ REAR

FAILED PART(S): ☒ ORIGINAL ☐ REPLACEMENT

NO. OF FAILURES: 2

DATE(S) OF FAILURE(S): 7 93

MILEAGE AT FAILURE(S): Aprox 600

VEHICLE SPEED AT FAILURE(S): 0

MANUFACTURER CONTACTED: Tire Dealer ☒ YES ☐ NO

NHTSA PREVIOUSLY CONTACTED: ☐ YES ☐ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT: ☐ Yes ☒ No

FIRE: ☐ Yes ☒ No

NUMBER OF PERSONS INJURED: 0

NUMBER OF FATALITIES: 0

PROPERTY DAMAGE EST $: 0

POLICE REPORT FILED: ☐ YES ☐ NO N/A

FAILED TIRE INFORMATION ONLY

TIRE IDENTIFICATION NO.*: DOT VN#LMD213

MANUFACTURER TIRE NAME: Firestone RADIAL ATX

SIZE: P235/75R15

* The identification number consists of 7 to 10 letters and numerals following the letters DOT. It is usually located near the rim flange on the side opposite the whitewall or on either side of a blackwall tire.

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJURY(IES) ON THE BACK

The Privacy Act of 1974
Public Law 93-579

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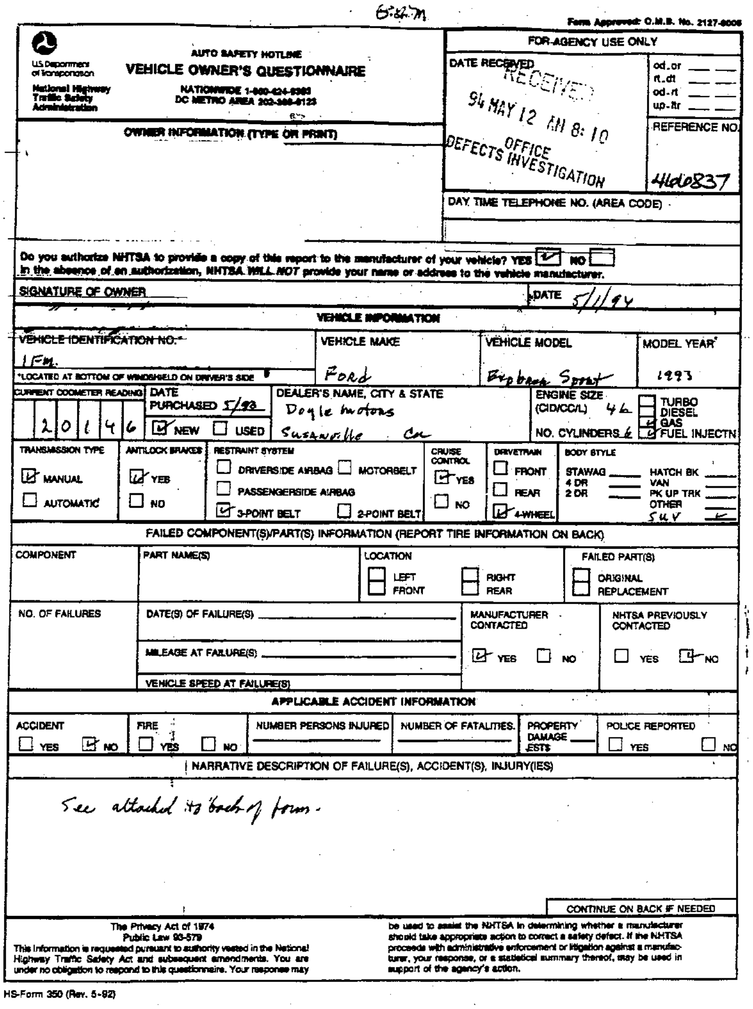
ENG0061A
E1197

① One Tire Blew while sitting in th Driveway.

② Found a 1" x 4" blister on Tire while I was looking for The DOT # , as I was Filling out This report.



6:47 m

Form Approved: O.M.B. No. 2127-0008

U.S. Department of Transportation
National Highway Traffic Safety Administration

AUTO SAFETY HOTLINE
VEHICLE OWNER'S QUESTIONNAIRE
NATIONWIDE 1-800-424-9393
DC METRO AREA 202-366-0123

FOR AGENCY USE ONLY

DATE RECEIVED
RECEIVED
94 MAY 12 AM 8: 10
OFFICE
DEFECTS INVESTIGATION

od.or ___ ___
rt.dt ___ ___
od.rt ___ ___
up.ltr ___ ___

REFERENCE NO. 4606837

OWNER INFORMATION (TYPE OR PRINT)

DAY TIME TELEPHONE NO. (AREA CODE)

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☑ NO ☐
In the absence of an authorization, NHTSA *WILL NOT* provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER

DATE 5/1/94

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.* 1FM. *LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE	VEHICLE MAKE Ford	VEHICLE MODEL Explorer Sport	MODEL YEAR* 1993

CURRENT ODOMETER READING 2 0 1 4 6	DATE PURCHASED 5/93 ☑ NEW ☐ USED	DEALER'S NAME, CITY & STATE Doyle Motors Susanville Ca	ENGINE SIZE (CID/CC/L) 4L NO. CYLINDERS 6 ☐ TURBO ☐ DIESEL ☑ GAS ☑ FUEL INJECTN

TRANSMISSION TYPE ☑ MANUAL ☐ AUTOMATIC	ANTILOCK BRAKES ☑ YES ☐ NO	RESTRAINT SYSTEM ☐ DRIVERSIDE AIRBAG ☐ MOTORBELT ☐ PASSENGERSIDE AIRBAG ☑ 3-POINT BELT ☐ 2-POINT BELT	CRUISE CONTROL ☑ YES ☐ NO	DRIVETRAIN ☐ FRONT ☐ REAR ☑ 4-WHEEL	BODY STYLE STAWAG ___ HATCH BK ___ 4 DR ___ VAN ___ 2 DR ___ PK UP TRK ___ OTHER ___ SUV ✓

FAILED COMPONENT(S)/PART(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT	PART NAME(S)	LOCATION ☐ LEFT ☐ RIGHT ☐ FRONT ☐ REAR	FAILED PART(S) ☐ ORIGINAL ☐ REPLACEMENT

NO. OF FAILURES	DATE(S) OF FAILURE(S) ___ MILEAGE AT FAILURE(S) ___ VEHICLE SPEED AT FAILURE(S)	MANUFACTURER CONTACTED ☑ YES ☐ NO	NHTSA PREVIOUSLY CONTACTED ☐ YES ☑ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT ☐ YES ☑ NO	FIRE ☐ YES ☐ NO	NUMBER PERSONS INJURED ___	NUMBER OF FATALITIES. ___	PROPERTY DAMAGE ___ EST$	POLICE REPORTED ☐ YES ☐ NO

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJURY(IES)

See attached its back of form.

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93-579

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HS-Form 350 (Rev. 5-92)

Fold to show Return Address (no stamp needed) Fasten with tape or staple and mail

INFORMATION ON TIRE FAILURE(S) (IF APPLICABLE)

TIRE IDENTIFICATION NO.*		
D O T W 2 H L 1 M 0 1 4 3	MANUFACTURER/TIRE NAME Firestone	SIZE P225/70R15

* The identification number consists of 7 to 10 letters and numerals following the letters DOT. It is usually located near the rim flange on the side opposite the whitewall or on either side of a blackwall tire.

NARRATIVE DESCRIPTION (CONTINUED)

☆ U.S.G.P.O.: 1992 – 623-897 / 80086

U.S. Department of Transportation
National Highway Traffic Safety Administration
400 Seventh St., S.W.
Washington, D.C. 20590

Official Business
Penalty for Private Use $300

REDDING, CA 960
PM
6 MAY
1994

ALWAYS USE ZIP CODE

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FIRST CLASS PERMIT NO. 73173 · WASHINGTON, D.C.

POSTAGE WILL BE PAID BY NATL HWY TRAFFIC SAFETY ADMIN.

U.S. Department of Transportation
National Highway Traffic Safety Administration
Auto Safety Hotline, NEF-11 HL
400 7th Street, SW
Washington, DC 20590

Recap of previous correspondence.

1. Tires will not stop vehicle in a safe distance.
    a. Road and Track tests 60 to 0 braking at 180+ feet, I test 190+, far exceeding safe standards.
    b. Shortly after changing tires to Michelins I test in the 150 foot range.
    c. The day after I changed tires, a 1990 Blazer S-10 ran a stop sign in front of me. Traffic did not allow alternate lanes. I stopped 6 inches from the Blazer. On the Firestones I would have impacted the Blazer at a speed in excess of 20 mph. The impact would have caused critical, if not fatal, injuries to the passenger in the Blazer. (Furthermore, should the lanes have been available, I would not have been able to control lane changes on the Firestones.)

    Conclusion: The tires stop so poorly they are fatally unsafe.
2. Tires will not allow vehicle to corner safely.
    a. In a corner I can safely traverse at speeds well in excess of 65 mph on the Michelins, I cannot traverse at over 40 on the Firestones without losing control. Furthermore, the spins are generally unrecoverable, unlike those on other tire brands.
    b. The Explorer lost control at 40 mph on a corner normally traversed safely and usually at 45+ mph by virtually all local vehicles.

    Conclusion: Normal safe speeds cannot be utilized while on the Firestones. They are fatally unsafe.
3. On roads that I have driven 100,000 plus miles with only one flat (caused by a large nail) on other brands, two of the Firestones self destructed causing dangerous driving situations in the first 4,000 miles.

    Conclusion: The Firestones are so poorly constructed they are Fatally unsafe to drive upon.
4. Parked side by side with similar vehicles on other brands, on icy/snowy roads, the other brands could leave the driveway in 2wd with no slipping. The vehicle with Firestones could barely drive in 4wd, with substantial slipping.

    Conclusion: The Firestones are so poorly designed they are Fatally unsafe to use.
5. It is not possible to brake in a controlled straight line, even with ABS, using the Firestones. Significant side to side alignment "pulls" occur. These do not appear with other brands.

    Conclusion: The Firestones are so unstable as to be Fatally unsafe to use.
6. The Ford manual forbids use of All Season Tires, requiring instead All Terrain Tires. The safe use, on highway, requires the opposite.

Statistically it is probable safe to say about Firestones as delivered: 1. A huge percentage of accidents would have been avoided by use of safer tires. 2. Virtually all injuries would be reduced by use of safer tires. 3. At least 1/2 of the experienced fatalities would be avoided on safer tires.

466837

ODE

February 22, 1994

Administrator
National Highway Transportation and Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

PARA
DATE
DATE
DATE
DATE
LOGGED OUT

Dear Administrator,

Enclosed find a copy of a letter mailed to Ford Motor Company regarding the Firestone tires provided with my last two Ford purchases, especially my Explorer. Also find the Ford response, which clearly is not a response at all, where they even admit they exercise no quality control over the tires.

Ford also makes a false statement with their segment about not knowing what tires are being sourced. Every (several hundred) new Bronco II and Explorer vehicles I have seen in the last several years (on the West Coast) all have had one of the same two models of Firestone tires.

These tires are so dangerous and poorly constructed that I have been able to determine, albeit on a limited and therefor not complete methodology providing only trends, that fully one half of accidents regarding Bronco II's and Explorers could/would have been avoided had the vehicle been on acceptable tires such as the replacement Michelins currently on my Explorer. I would suspect the same would be true for other models provided with Firestones.

I would suggest that the Firestone tires are responsible for more accidents, injuries and deaths than the sum of all other factors for these two models and that this is probably also true for other models similarly equipped.

Presuming the research is accurate, and I strongly believe it to be so based on good evaluation tools, these tires represent the LARGEST THREAT TO PASSENGER SAFETY currently faced by Ford customers (and other vendors?) in the United States.

I formally would like to charge Ford Motor Company with extreme negligence in the act of supplying tires so below the handling and quality standards set by other suppliers using state of the art design, materials and construction.

I also formally request the NHTSA to immediately (due to the extreme level of danger present when compared to other factors) evaluate the tire performance and, if the findings are as I am certain they will be, take the actions requested in the enclosed letter to Ford. That is, an immediate recall with refunds to the customers for replacement and an immediate cessation of vending such dangerous products.

Thank You,

-7 PM 1:34
OFFICE
INVESTIGATION

cc: Ford Motor Company
Miscellaneous Consumer Organizations

Ford Parts and Service Division
Ford Motor Company

P.O. Box 43360
Detroit, Michigan 48243

November 10, 1993

Thank you for your recent letter.

We regret your dissatisfaction with the tires on your Ford Explorer. Our production system is set up to select tires by type, size and rating, but does not select by brand. Therefore, we have no way of ensuring that a particular brand of tire will be used on a vehicle when it is manufactured.

eedback from our customers is important to us, and helps us to provide higher quality vehicles and improved service to our customers. We recognize we must meet the needs of the buying public if we are to be successful in today's competitive market.

While we are unable to comply with your request, please be assured that your comments have been forwarded directly to the proper area. We are sure they, together with all other comments received, will be considered in the future.

Thank you for taking the time to write.

Sincerely,

Julia A. Mercier

Julia A. Mercier
Customer Assistance Center

October 1, 1993

Ford Motor Company
Costumer Assistance Center
300 Renaissance Center
P.O. Box 43360
Detroit, Michigan 48243

Distribution: All appropriate Ford management.
Ford legal department.

Enclosed find a bill for $392.71. This correspondence is in support of the bill and a demand for actions leading to a required safety action.

Last May I purchased a new Ford Explorer two door.

I have been very pleased with the automobile with the one exception of a glaring and totally unreasonable safety failing.

At the time of the purchase I warned the dealer that I did not want the Firestone tires that came with the vehicle as I had serious problems with the ones on the Bronco II I had purchased five years ago, and again on a two year old four door Explorer I often use.

The dealer assured me I would be getting an upgraded tire model which is, in fact, true.

Over roads I have put more than 160,000 miles on in my other automobiles (and tire brands) in the last four years with only one flat (and that from a large steel shard) I suffered, with my new factory supplied Firestones, rock bruises that rendered two tires unsafe to repair within the first month.

Braking, prior to replacing the tires with another brand, took over 180 feet from sixty mph to zero (Road and Track magazine tests were somewhat shorter at 183 feet, and were labeled beyond the normal braking range). With the new tires, braking on exactly the same surfaces and temperatures result in stopping distances of under 150 feet.

THAT IS A REDUCTION IN BRAKING DISTANCE OF ALMOST 40 FEET, OR ALMOST 25%.

Emergency cornering, on a test corner I use because of a bona fide emergency I once had on that corner, started a spin at about 35 mph, and was not recoverable.

Under the replaced tires I have easily negotiated the same corner at 65 mph with no instability. On a skidpad I can induce an incipient spin and subsequently recover with minimal effort.

THIS MEANS EMERGENCY HANDLING SPEEDS ARE ESSENTIALLY DOUBLED!

An added bonus to the tire replacement was an immediate increase in fuel mileage of an average of 10%.

Two personal events in comparison of the tire performances.

1. Shortly after replacing the tires I was approaching an intersection in a 55 mph zone, east of Chico, California, where I met traffic on my left in a left turn lane waiting to turn, and the same on my right. A full size Blazer ran the stop sign an my left, pulled directly in front of me, and stopped. With no escape, I braked hard, invoking full ABS. I stopped within a very few inches of the Blazer, with the center of my hood aimed directly at the passenger in the Blazer.

Subsequent mathematics indicated that, if I had still been using the Firestones, I would have impacted the Blazer at about 20 mph.

A 20 mph side impact is often fatal to the passenger in the vehicle receiving the impact.

2. A Ford Bronco II and a four door Explorer are parked side by side facing a slight uphill to a main road. The Bronco did not have Firestones, the Explorer did. The roads were somewhat icy. The Bronco was started and drove onto the main road in two wheel drive without any spinning or sliding. The Explorer not only could not make the exit in two wheel drive, it almost did not make it in four wheel drive, with much slipping in evidence. That same Explorer was involved in a serious accident within two weeks, losing traction on a California State Highway 32.
All tires had less than 25% tread wear.

CONCLUSIONS:

1. The factory supplied Firestone tires from Ford are of such inferior construction they cannot be used without them being destroyed in modest off road conditions for which they are represented to be competent. Other brand tires of similar price range and represented design have NO problems in identical conditions.

2. The factory supplied Firestone tires from Ford are of such inferior design and construction that they are unsafe to use in normal driving conditions. Their braking action is so substandard as to render them dangerous in all traffic conditions, their handling characteristics are so substandard as to actually make them accident prone under normal driving events.

3. These inherently dangerous characteristics carry over to other driving conditions.

PROBLEM TWO.

According to the Ford owner's manual the supplied tires, rated All Terrain, must not be replaced with tires rated All Season (Mud and Snow). Page 292.

All Terrain tires are supposed to be designed for primarily off road work in dirt and limited sand. (Clearly the Firestones do not hold up in these environments). Explorers are most often purchased, at least in the West, for use on normal road surfaces with the four wheel drive feature used in snow and limited mud. The design for this use is All Season (Mud and Snow).

California State Law even requires the use of All Season (Mud and Snow) for the tires to be used under level one and two road controls for snow and icy conditions.

The All Terrain tire is inherently design dangerous in Mud and Snow environments, as well as of limited function on normal dry roads. All Terrain tires do not meet the use parameters of Ford Explorers. The All Season tire meets the design specifications for the general use of Explorers.

FORD MOTOR COMPANY HAS WILLFULLY AND INTENTIONALLY MADE CORRECT TIRE DESIGN REPLACEMENT AN IMPROPER ACT, CAUSING DEALERS TO NOT WISH TO SELL THE PROPER TIRE TO AN EXPLORER OWNER. (Example: COSTCO, Anchorage, Alaska.)

It is quite possible this is a criminal action under current legislation.

Requirements of this document:

1. I be reimbursed for the four tires I was required to replace due to the unsafe and inferior design and construction of the tires supplied. (These tires are available to you should your representative wish to come and get them.)

2. The Ford Motor Company immediately cease and desist the supply of these unsafe and inferior tires on all new vehicles.

3. All previously supplied Firestones of the two models currently supplied be immediately recalled and replaced with tires with proven Independent Test Track specifications meeting the standards of the tires I am currently using (Michelin).

4. The Ford Motor Company immediately change the tire design recommended in the Owner's Handbook to All Season (Mud and Snow) and all previous owners and all tire dealers be so notified.

Action if requirements are not met with ninety days.

1. Filing under appropriate lemon laws for the listed actions, reimbursement and damages.

2. Notification of consumer organizations and State and Federal Consumer departments, with appropriately filed complaints and recommendations for both civil and criminal proceedings.

3. Copies to legislators.

I can imagine your first response: negative. May I suggest your legal department require objective, independent track testing of the information provided above. You will be required to do it anyway at a later date and it will, if you have any competent management at all, both save lives and save you, and ultimately me as a consumer, money. Lots of money.

Most Sincerely,

[redacted]

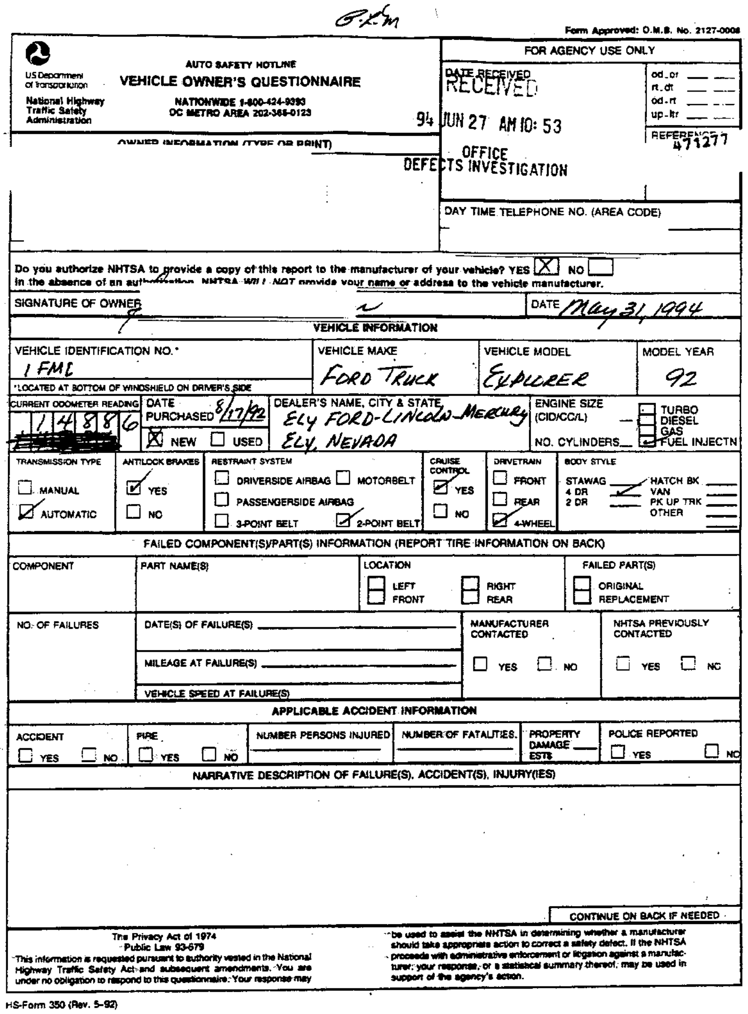
October 1, 1993

Invoice.

To Ford Motor Company
P.O. Box 43360
Detroit, Michigan 48243

For the replacement of four Firestone tires.

From COSTCO, Anchorage, Alaska	$180.98
From COSTCO, Chico, California	195.73
Temporary Repair, Inuvik, NWT, Canada	16.00
Total due and payable	$392.71



G.K.M

Form Approved: O.M.B. No. 2127-0008

US Department of Transportation
National Highway Traffic Safety Administration

AUTO SAFETY HOTLINE
VEHICLE OWNER'S QUESTIONNAIRE
NATIONWIDE 1-800-424-9393
DC METRO AREA 202-366-0123

FOR AGENCY USE ONLY
DATE RECEIVED
RECEIVED
94 JUN 27 AM 10: 53
OFFICE
DEFECTS INVESTIGATION

od_or ___ ___
rt_dt ___ ___
od_rt ___ ___
up_ltr ___ ___

REFERENCE 471277

OWNER INFORMATION (TYPE OR PRINT)

DAY TIME TELEPHONE NO. (AREA CODE)

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☒ NO ☐
In the absence of an authorization, NHTSA WILL NOT provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER
DATE May 31, 1994

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.* 1 FMC
*LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE
VEHICLE MAKE Ford Truck
VEHICLE MODEL Explorer
MODEL YEAR 92

CURRENT ODOMETER READING 14886
DATE PURCHASED 8/17/92
☒ NEW ☐ USED
DEALER'S NAME, CITY & STATE Ely Ford-Lincoln-Mercury
Ely, Nevada
ENGINE SIZE (CID/CC/L) ___
NO. CYLINDERS ___
☐ TURBO
☐ DIESEL
☐ GAS
☑ FUEL INJECTN

TRANSMISSION TYPE: ☐ MANUAL ☑ AUTOMATIC
ANTILOCK BRAKES: ☑ YES ☐ NO
RESTRAINT SYSTEM: ☐ DRIVERSIDE AIRBAG ☐ MOTORBELT ☐ PASSENGERSIDE AIRBAG ☐ 3-POINT BELT ☑ 2-POINT BELT
CRUISE CONTROL: ☑ YES ☐ NO
DRIVETRAIN: ☐ FRONT ☐ REAR ☑ 4-WHEEL
BODY STYLE: STAWAG ___ 4 DR ✓ 2 DR ___ HATCH BK ___ VAN ___ PK UP TRK ___ OTHER ___

FAILED COMPONENT(S)/PART(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT
PART NAME(S)
LOCATION: ☐ LEFT ☐ FRONT ☐ RIGHT ☐ REAR
FAILED PART(S): ☐ ORIGINAL ☐ REPLACEMENT

NO. OF FAILURES
DATE(S) OF FAILURE(S) ___
MILEAGE AT FAILURE(S) ___
VEHICLE SPEED AT FAILURE(S)
MANUFACTURER CONTACTED: ☐ YES ☐ NO
NHTSA PREVIOUSLY CONTACTED: ☐ YES ☐ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT: ☐ YES ☐ NO
FIRE: ☐ YES ☐ NO
NUMBER PERSONS INJURED ___
NUMBER OF FATALITIES ___
PROPERTY DAMAGE EST$ ___
POLICE REPORTED: ☐ YES ☐ NO

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJURY(IES)

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93-579
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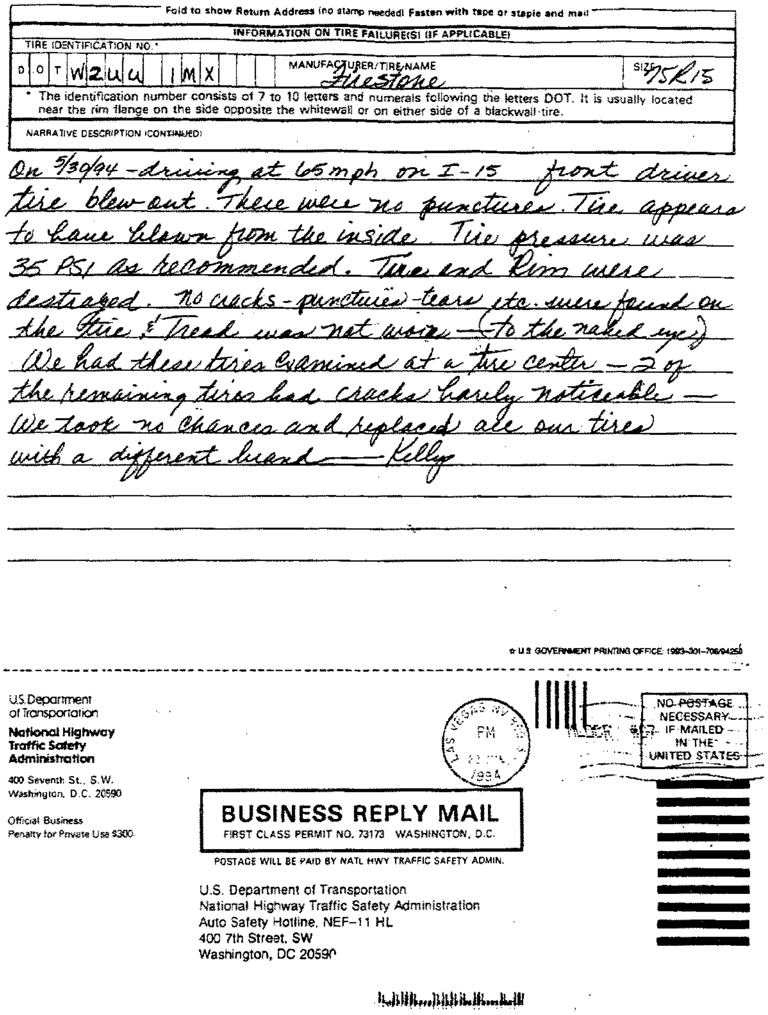
HS-Form 350 (Rev. 5-92)



Fold to show Return Address (no stamp needed) Fasten with tape or staple and mail

INFORMATION ON TIRE FAILURE(S) (IF APPLICABLE)

TIRE IDENTIFICATION NO.*

D	O	T	W	2	U	W		I	M	X				MANUFACTURER/TIRE NAME Firestone	SIZE 75R15

* The identification number consists of 7 to 10 letters and numerals following the letters DOT. It is usually located near the rim flange on the side opposite the whitewall or on either side of a blackwall tire.

NARRATIVE DESCRIPTION (CONTINUED)

On 5/30/94 - driving at 65 mph on I-15 front driver
tire blew out. There were no punctures. Tire appears
to have blown from the inside. Tire pressure was
35 PSI as recommended. Tire and Rim were
destroyed. No cracks - punctures - tears etc. were found on
the tire & Tread was not worn — (to the naked eye)
We had these tires examined at a tire center — 2 of
the remaining tires had cracks barely noticeable —
We took no chances and replaced all our tires
with a different brand — Kelly

☆ U.S. GOVERNMENT PRINTING OFFICE: 1993-301-706/94250

U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

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1994

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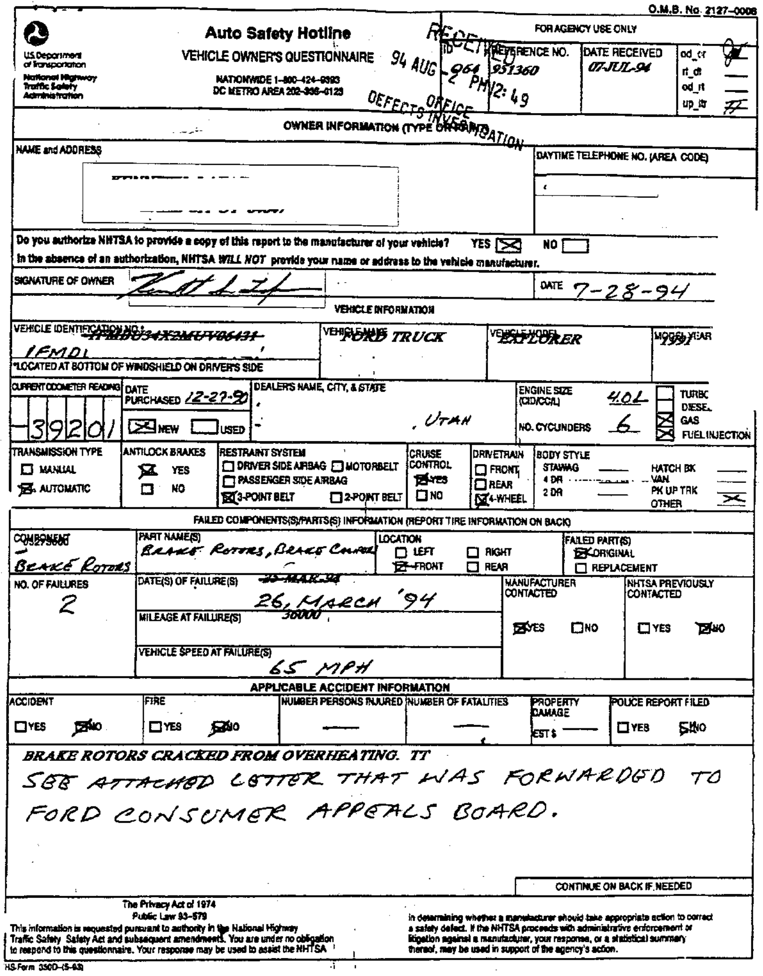
U.S. Department of Transportation
National Highway Traffic Safety Administration
Auto Safety Hotline, NEF-11 HL
400 7th Street, SW
Washington, DC 20590



O.M.B. No. 2127-0008

U.S. Department of Transportation
National Highway Traffic Safety Administration

Auto Safety Hotline
VEHICLE OWNER'S QUESTIONNAIRE
NATIONWIDE 1-800-424-9393
DC METRO AREA 202-366-0123

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DEFECTS INVESTIGATION

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ID	REFERENCE NO.	DATE RECEIVED	
964	951360	07-JUL-94	od_cr rt_dt od_rt up_dt

OWNER INFORMATION (TYPE OR PRINT)

NAME and ADDRESS [redacted]

DAYTIME TELEPHONE NO. (AREA CODE)

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☒ NO ☐
In the absence of an authorization, NHTSA *WILL NOT* provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER

DATE 7-28-94

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.* ~~1FMDU34X2MUV06431~~ 1FMDL [redacted]
*LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE

VEHICLE MAKE FORD TRUCK

VEHICLE MODEL EXPLORER

MODEL YEAR 1991

CURRENT ODOMETER READING 39201

DATE PURCHASED 12-27-90

☒ NEW ☐ USED

DEALER'S NAME, CITY, & STATE [redacted], UTAH

ENGINE SIZE (CID/CC/L) 4.0L

NO. CYLINDERS 6

☐ TURBO
☐ DIESEL
☒ GAS
☒ FUEL INJECTION

TRANSMISSION TYPE ☐ MANUAL ☒ AUTOMATIC

ANTILOCK BRAKES ☒ YES ☐ NO

RESTRAINT SYSTEM ☐ DRIVER SIDE AIRBAG ☐ MOTORBELT ☐ PASSENGER SIDE AIRBAG ☒ 3-POINT BELT ☐ 2-POINT BELT

CRUISE CONTROL ☒ YES ☐ NO

DRIVETRAIN ☐ FRONT ☐ REAR ☒ 4-WHEEL

BODY STYLE STA/WAG ___ 4 DR ___ 2 DR ___ HATCH BK ___ VAN ___ PK UP TRK ___ OTHER X

FAILED COMPONENTS(S)/PARTS(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT 03273000 - BRAKE ROTORS

PART NAME(S) BRAKE ROTORS, BRAKE CALIPER

LOCATION ☐ LEFT ☐ RIGHT ☒ FRONT ☐ REAR

FAILED PART(S) ☒ ORIGINAL ☐ REPLACEMENT

NO. OF FAILURES 2

DATE(S) OF FAILURE(S) ~~25-MAR-94~~ 26, MARCH '94

MILEAGE AT FAILURE(S) 36000

VEHICLE SPEED AT FAILURE(S) 65 MPH

MANUFACTURER CONTACTED ☒ YES ☐ NO

NHTSA PREVIOUSLY CONTACTED ☐ YES ☒ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT ☐ YES ☒ NO

FIRE ☐ YES ☒ NO

NUMBER PERSONS INJURED —

NUMBER OF FATALITIES —

PROPERTY DAMAGE EST $ —

POLICE REPORT FILED ☐ YES ☒ NO

BRAKE ROTORS CRACKED FROM OVERHEATING. TT

SEE ATTACHED LETTER THAT WAS FORWARDED TO FORD CONSUMER APPEALS BOARD.

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93-579

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HS Form 350D-(5-93)

July 29, 1994

To whom it may concern,

I have had numerous problems with my 1991 Ford Explorer, which was purchased December 27, 1990 from Henry S. Day Ford in Salt Lake City. The Vehicle Identification number for the vehicle is VIN # and at this time has approx. 39,000 miles on it. The problems with the vehicle began from the day picked it up to the present, some problems have been resolved, but others remain unresolved to this day. A chronology of the problems I've had with this vehicle will follow. The most recent and unresolved problem deals with the failure of the brake system on, March 26, 1994 and is of primary concern at this time, since I believe the vehicle to be unsafe to drive and the dealerships and/or the manufacturer has failed to come up with a solution that is satisfactory to all the parties involved.

On, or about, March 26, 1994, I was driving the Ford Explorer on Interstate 80 between Park City, Utah and my residence in Salt Lake City, Utah when the brake system on the vehicle overheated causing the brake rotors to crack. This failure had the potential of causing the vehicle to become uncontrollable and placed my life and also the lives of the three other passengers in the vehicle at risk. After the vehicle was brought to a stop I had the vehicle towed to my residence where it stayed parked until Monday, March 28, 1994. On the morning of March 28, I went down to Rick Warner Ford Service in Salt Lake City, Utah, which was the dealership that had been doing the most current service on this vehicle, and discussed the problem that had occurred with the brake system with one of the service advisors. The Service Advisor told me that the vehicle was out of warranty and that the repairs would have to be at my expense. I took the service advisor's word that the brake system repairs would not be covered under warranty and proceeded to have the vehicle serviced. The brake servicing required that both the brake calipers as well as both brake rotors be replaced, since the overheating had cause the phenolic pistons in the calipers to crack and also had caused the brake rotors to overheat and crack. While the brake system was being serviced, it was discovered that part of the four-wheel drive hub assembly had been damaged by the excessive heat. Since the hub design on the vehicle had been changed several times since the vehicles introduction to the market, Rick Warner Ford Service agreed to replace the hubs under warranty. It later turned out that the Service Advisor was incorrect about the brake system not being covered under warranty, because the vehicle had a 4-Year/50,000 Mile powertrain warranty which had covered the hubs, but the monies that I had paid out to have the brakes repaired was never reimbursed, and I believe that those monies are owed to me by Ford Motor Company. The Service Manager, Randy Sandstrom told me that there had been on going problems with the brake system on Ford Explorer's and that even the most current models of the Explorer have had brake system problems. He also told me that the vehicle was not designed to be driven in the type of geographic climate that we live in, but was designed as a commuter vehicle and performs adequately in a flatter urban environments. The problem is that Ford Motor Company and its affiliated dealers are presenting this vehicle to the public as a sport utility vehicle, stating that it has a 5000 lb. towing capacity, showing advertising of the vehicle in off-road applications, and are selling it in the environment that I live in. Nobody disclosed this to me when I purchased the vehicle that it was not designed for the hilly environment that I live in and that it had the potential of having a catastrophic brake failure which would put my life at risk. The bottom line is that the brake system on this vehicle is under designed for the vehicles weight and is completely unsafe. I have talked to hundreds of Ford Explorer owners about the problems with their vehicles and every single one of them has told me that they have had brake problems of one kind or the other. I believe that Ford Motor Company is placing every explorer owner's, and their families, lives at risk.

With this latest safety related problem with the brakes on my Explorer. I believe that Ford Motor Company owes me a considerable amount of compensation for the damage that this vehicle has caused to me and my family. Consider that, I have gone to every measure to resolve the problems with my Ford Explorer; I will not subject my family and the lives of the public to the risks of a fatal accident by continuing to drive this vehicle. I do not want this vehicle replaced with another Ford Explorer because I believe that the conditions of my vehicle still exist on the most current of Ford Explorers. I would like to be compensated in a monetary fashion for the monies, time consumption, and emotional damage that owning this vehicle has caused.

Sincerely,

[redacted]

Chronology of Problems on '91 Ford Explorer

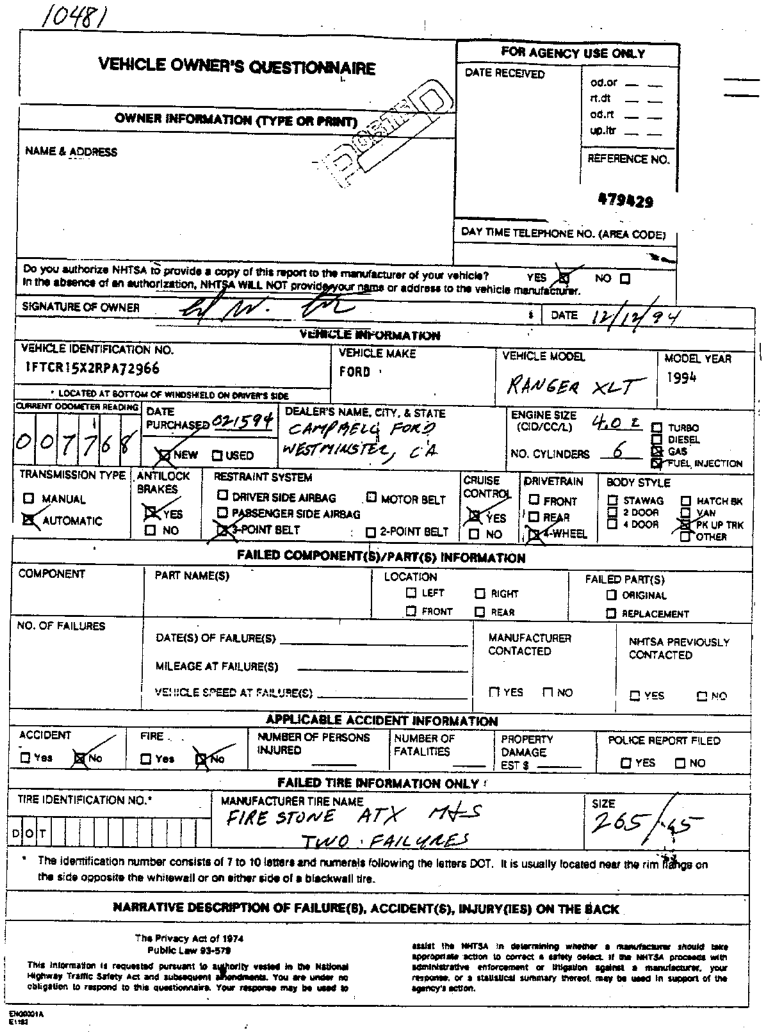
(Does not include recall repair work or regular maintenance.)

uw - Covered under warranty **op** - Owner paid for repair

Problem	Action Taken	Date	Status
Butterfield Ford Service(below)			
Noise left front wheel	Tires Balanced-uw	7/12/94	Unresolved
Rick Warner Ford Service(below)			
Brake System Failure	Calipers, rotors, and pads replaced-op	3/28/94	Unresolved
4x4 Hub Failure	Hubs replaced-uw	3/28/94	Resolved
AC System Failure	Refrigerant re-charged-uw	3/28/94	Resolved
Engine Gaskets Leaking Valve Cover Seals Fuel Rail Seal Oil Pan Seal Main Seal Eng./Trans. Seal Misc. Seals	All Seals Replaced-uw	3/28/94	Resolved
Tire Failure	Firestone-uw&op	7/29/93	Resolved
Rocker Rubber Panel	Dealer Provided Parts-uw Owner Installed-op	6/24/93	Resolved
Rocker panel paint peeling	Repainted-4th time-uw	6/16/93	Resolved
Missing Paint on door jams	Painted-uw	6/16/93	Resolved
Power Steering hose rusting	Hose Replaced-uw	4/30/93	Resolved

Chronology (cont.)

Problem	Action Taken	Date	Status
Rocker panel paint peeling	Repainted-3rd time-uw	4/30/93	See 6/16/93
Industrial Fallout	Treated-uw	4/30/93	Still a problem
Front Grill forms Structural Crack	Grill Replaced-op	3/10/93	Owner resolved
Rear Jet Assy. Broke	Jet Assy. Replaced-op	1/22/93	Owner resolved
Rt. Side Door Lock Failed	Door Switch Replaced-op	5/21/92	Owner Resolved
Paint peeling on Antenna mast	Repainted-op	~1/14/92	Owner resolved
Paint peeling on side mirrors	Nothing Done	~1/14/92	Unresolved
Rocker panels re-paint	Repainted-2nd time-uw	~1/14/92	See 6/16/93
Henry S. Day Ford Service(below)			
Rocker panels peeling	Repainted-1st time-uw	~12/16/91	See 6/16/93
Vehicle out of Alignment	Radius Arm replaced-uw	9/30/91	Resolved
Radio making popping noise	Exchanged Radio-uw	9/30/91	Resolved
Vent Broken	Vent replaced-uw	9/13/91	Resolved
Brakes Pulsing	Nothing Done	8/30/91	Unresolved
Hubs making noise	Nothing Done	8/30/91	Unresolved
Engine growling	Nothing Done	1/10/91	Unresolved



10481

VEHICLE OWNER'S QUESTIONNAIRE

POSTED

FOR AGENCY USE ONLY

DATE RECEIVED

od.or __ __
rt.dt __ __
od.rt __ __
up.ltr __ __

REFERENCE NO. 479429

OWNER INFORMATION (TYPE OR PRINT)

NAME & ADDRESS

DAY TIME TELEPHONE NO. (AREA CODE)

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☒ NO ☐
In the absence of an authorization, NHTSA WILL NOT provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER

DATE 12/12/94

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO. 1FTCR15X2RPA72966
* LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE

VEHICLE MAKE FORD

VEHICLE MODEL RANGER XLT

MODEL YEAR 1994

CURRENT ODOMETER READING 007768

DATE PURCHASED 021594 ☒ NEW ☐ USED

DEALER'S NAME, CITY, & STATE CAMPBELL FORD WESTMINSTER, CA

ENGINE SIZE (CID/CC/L) 4.0 L

NO. CYLINDERS 6

☐ TURBO
☐ DIESEL
☒ GAS
☒ FUEL INJECTION

TRANSMISSION TYPE ☐ MANUAL ☒ AUTOMATIC

ANTILOCK BRAKES ☒ YES ☐ NO

RESTRAINT SYSTEM ☐ DRIVER SIDE AIRBAG ☐ MOTOR BELT ☐ PASSENGER SIDE AIRBAG ☒ 3-POINT BELT ☐ 2-POINT BELT

CRUISE CONTROL ☒ YES ☐ NO

DRIVETRAIN ☐ FRONT ☐ REAR ☒ 4-WHEEL

BODY STYLE ☐ STAWAG ☐ 2 DOOR ☐ 4 DOOR ☐ HATCH BK ☐ VAN ☒ PK UP TRK ☐ OTHER

FAILED COMPONENT(S)/PART(S) INFORMATION

COMPONENT

PART NAME(S)

LOCATION ☐ LEFT ☐ RIGHT ☐ FRONT ☐ REAR

FAILED PART(S) ☐ ORIGINAL ☐ REPLACEMENT

NO. OF FAILURES

DATE(S) OF FAILURE(S) ______

MILEAGE AT FAILURE(S) ______

VEHICLE SPEED AT FAILURE(S) ______

MANUFACTURER CONTACTED ☐ YES ☐ NO

NHTSA PREVIOUSLY CONTACTED ☐ YES ☐ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT ☐ Yes ☒ No

FIRE ☐ Yes ☒ No

NUMBER OF PERSONS INJURED ______

NUMBER OF FATALITIES ______

PROPERTY DAMAGE EST $ ______

POLICE REPORT FILED ☐ YES ☐ NO

FAILED TIRE INFORMATION ONLY

TIRE IDENTIFICATION NO.* D O T

MANUFACTURER TIRE NAME FIRE STONE ATX M+S TWO FAILURES

SIZE 265/45

* The identification number consists of 7 to 10 letters and numerals following the letters DOT. It is usually located near the rim flange on the side opposite the whitewall or on either side of a blackwall tire.

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJURY(IES) ON THE BACK

The Privacy Act of 1974
Public Law 93-579

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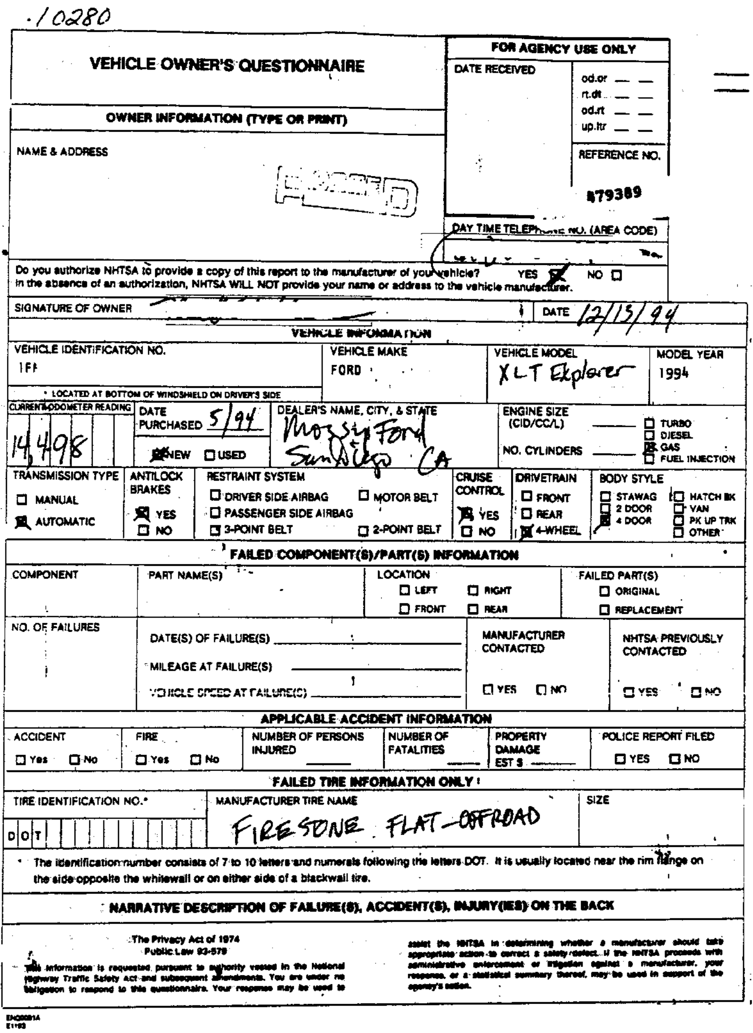
E1193



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VEHICLE OWNER'S QUESTIONNAIRE

FOR AGENCY USE ONLY

DATE RECEIVED

od.or __ __
rt.dt __ __
od.rt __ __
up.ltr __ __

REFERENCE NO.
879389

OWNER INFORMATION (TYPE OR PRINT)

NAME & ADDRESS

FAXED

DAY TIME TELEPHONE NO. (AREA CODE)

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☒ NO ☐
In the absence of an authorization, NHTSA WILL NOT provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER

DATE 12/13/94

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO. 1FF
* LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE

VEHICLE MAKE FORD

VEHICLE MODEL XLT Explorer

MODEL YEAR 1994

CURRENT ODOMETER READING 14,498

DATE PURCHASED 5/94

☒ NEW ☐ USED

DEALER'S NAME, CITY, & STATE Mossy Ford San Diego CA

ENGINE SIZE (CID/CC/L) ______

NO. CYLINDERS ______

☐ TURBO
☐ DIESEL
☒ GAS
☐ FUEL INJECTION

TRANSMISSION TYPE
☐ MANUAL
☒ AUTOMATIC

ANTILOCK BRAKES
☒ YES
☐ NO

RESTRAINT SYSTEM
☐ DRIVER SIDE AIRBAG
☐ PASSENGER SIDE AIRBAG
☒ 3-POINT BELT
☐ MOTOR BELT
☐ 2-POINT BELT

CRUISE CONTROL
☒ YES
☐ NO

DRIVETRAIN
☐ FRONT
☐ REAR
☒ 4-WHEEL

BODY STYLE
☐ STAWAG
☐ 2 DOOR
☒ 4 DOOR
☐ HATCH BK
☐ VAN
☐ PK UP TRK
☐ OTHER

FAILED COMPONENT(S)/PART(S) INFORMATION

COMPONENT

PART NAME(S)

LOCATION
☐ LEFT ☐ RIGHT
☐ FRONT ☐ REAR

FAILED PART(S)
☐ ORIGINAL
☐ REPLACEMENT

NO. OF FAILURES

DATE(S) OF FAILURE(S) ______

MILEAGE AT FAILURE(S) ______

VEHICLE SPEED AT FAILURE(S) ______

MANUFACTURER CONTACTED ☐ YES ☐ NO

NHTSA PREVIOUSLY CONTACTED ☐ YES ☐ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT ☐ Yes ☐ No

FIRE ☐ Yes ☐ No

NUMBER OF PERSONS INJURED ______

NUMBER OF FATALITIES ______

PROPERTY DAMAGE EST $ ______

POLICE REPORT FILED ☐ YES ☐ NO

FAILED TIRE INFORMATION ONLY

TIRE IDENTIFICATION NO.* D O T

MANUFACTURER TIRE NAME FIRESTONE. FLAT-OFFROAD

SIZE

* The identification number consists of 7 to 10 letters and numerals following the letters DOT. It is usually located near the rim flange on the side opposite the whitewall or on either side of a blackwall tire.

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJURY(IES) ON THE BACK

The Privacy Act of 1974
Public Law 93-579

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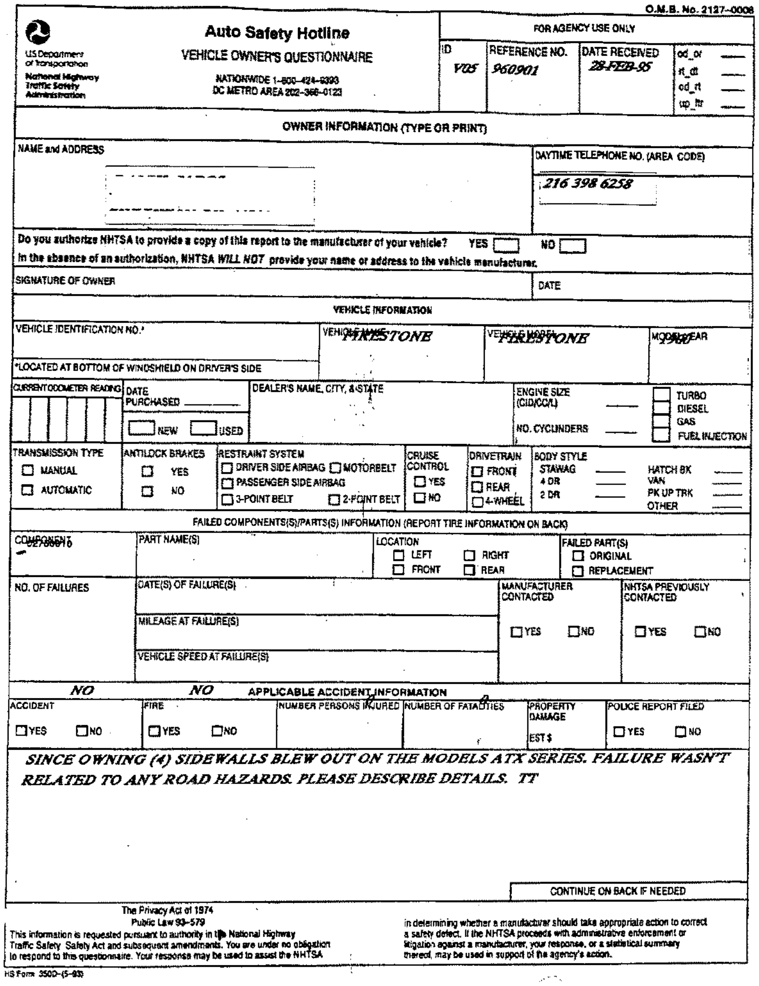
E11/93



O.M.B. No. 2127-0008

U.S. Department of Transportation
National Highway Traffic Safety Administration

Auto Safety Hotline

VEHICLE OWNER'S QUESTIONNAIRE

NATIONWIDE 1-800-424-9393
DC METRO AREA 202-366-0123

FOR AGENCY USE ONLY

ID	REFERENCE NO.	DATE RECEIVED	
V05	*960901*	*28-FEB-95*	od_or ___ rt_dt ___ od_rt ___ up_ltr ___

OWNER INFORMATION (TYPE OR PRINT)

NAME and ADDRESS [redacted]

DAYTIME TELEPHONE NO. (AREA CODE) *216 398 6258*

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☐ NO ☐
In the absence of an authorization, NHTSA *WILL NOT* provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER

DATE

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.*
*LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE

VEHICLE MAKE *FIRESTONE*

VEHICLE MODEL *FIRESTONE*

MODEL YEAR *1988*

CURRENT ODOMETER READING

DATE PURCHASED ______ ☐ NEW ☐ USED

DEALER'S NAME, CITY, & STATE

ENGINE SIZE (CID/CC/L) ______
NO. CYLINDERS ______
☐ TURBO ☐ DIESEL ☐ GAS ☐ FUEL INJECTION

TRANSMISSION TYPE ☐ MANUAL ☐ AUTOMATIC

ANTILOCK BRAKES ☐ YES ☐ NO

RESTRAINT SYSTEM ☐ DRIVER SIDE AIRBAG ☐ MOTORBELT ☐ PASSENGER SIDE AIRBAG ☐ 3-POINT BELT ☐ 2-POINT BELT

CRUISE CONTROL ☐ YES ☐ NO

DRIVETRAIN ☐ FRONT ☐ REAR ☐ 4-WHEEL

BODY STYLE STA/WAG ___ 4 DR ___ 2 DR ___ HATCH BK ___ VAN ___ PK UP TRK ___ OTHER ___

FAILED COMPONENTS(S)/PARTS(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT *02780010*

PART NAME(S)

LOCATION ☐ LEFT ☐ RIGHT ☐ FRONT ☐ REAR

FAILED PART(S) ☐ ORIGINAL ☐ REPLACEMENT

NO. OF FAILURES

DATE(S) OF FAILURE(S)

MILEAGE AT FAILURE(S)

VEHICLE SPEED AT FAILURE(S)

MANUFACTURER CONTACTED ☐ YES ☐ NO

NHTSA PREVIOUSLY CONTACTED ☐ YES ☐ NO

NO *NO* APPLICABLE ACCIDENT INFORMATION

ACCIDENT ☐ YES ☐ NO

FIRE ☐ YES ☐ NO

NUMBER PERSONS INJURED *0*

NUMBER OF FATALITIES *0*

PROPERTY DAMAGE EST $

POLICE REPORT FILED ☐ YES ☐ NO

SINCE OWNING (4) SIDEWALLS BLEW OUT ON THE MODELS ATX SERIES. FAILURE WASN'T RELATED TO ANY ROAD HAZARDS. PLEASE DESCRIBE DETAILS. TT

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93-579

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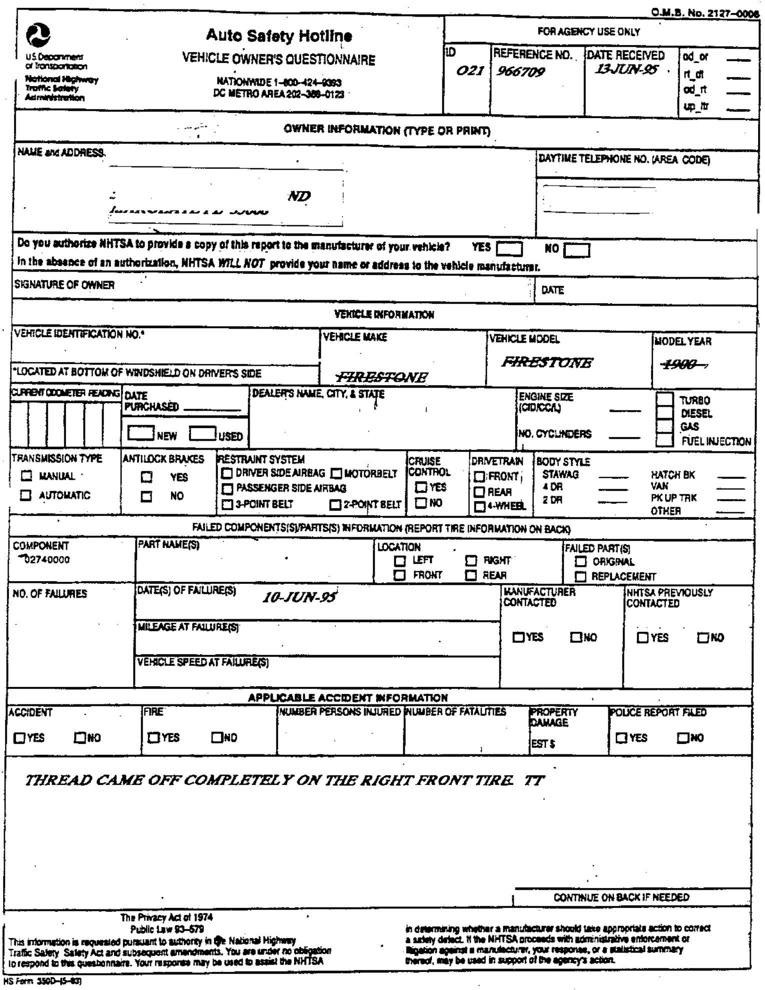
HS Form 350D-(5-93)



O.M.B. No. 2127–0008

U.S. Department of Transportation
National Highway Traffic Safety Administration

Auto Safety Hotline

VEHICLE OWNER'S QUESTIONNAIRE

NATIONWIDE 1–800–424–9393
DC METRO AREA 202–366–0123

FOR AGENCY USE ONLY

ID	REFERENCE NO.	DATE RECEIVED	
021	966709	13-JUN-95	od_or ___ rt_dt ___ od_rt ___ up_ltr ___

OWNER INFORMATION (TYPE OR PRINT)

NAME and ADDRESS: [redacted] ND

DAYTIME TELEPHONE NO. (AREA CODE): [redacted]

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☐ NO ☐

In the absence of an authorization, NHTSA *WILL NOT* provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER

DATE

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.*

*LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE

VEHICLE MAKE: ~~FIRESTONE~~

VEHICLE MODEL: FIRESTONE

MODEL YEAR: ~~1900~~

CURRENT ODOMETER READING

DATE PURCHASED ______ ☐ NEW ☐ USED

DEALER'S NAME, CITY, & STATE

ENGINE SIZE (CID/CC/L) ______

NO. CYLINDERS ______

☐ TURBO
☐ DIESEL
☐ GAS
☐ FUEL INJECTION

TRANSMISSION TYPE: ☐ MANUAL ☐ AUTOMATIC

ANTILOCK BRAKES: ☐ YES ☐ NO

RESTRAINT SYSTEM: ☐ DRIVER SIDE AIRBAG ☐ MOTORBELT ☐ PASSENGER SIDE AIRBAG ☐ 3-POINT BELT ☐ 2-POINT BELT

CRUISE CONTROL: ☐ YES ☐ NO

DRIVETRAIN: ☐ FRONT ☐ REAR ☐ 4-WHEEL

BODY STYLE: STAWAG ___ 4 DR ___ 2 DR ___ HATCH BK ___ VAN ___ PK UP TRK ___ OTHER ___

FAILED COMPONENTS(S)/PARTS(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT: 02740000

PART NAME(S)

LOCATION: ☐ LEFT ☐ RIGHT ☐ FRONT ☐ REAR

FAILED PART(S): ☐ ORIGINAL ☐ REPLACEMENT

NO. OF FAILURES

DATE(S) OF FAILURE(S): 10-JUN-95

MILEAGE AT FAILURE(S)

VEHICLE SPEED AT FAILURE(S)

MANUFACTURER CONTACTED: ☐ YES ☐ NO

NHTSA PREVIOUSLY CONTACTED: ☐ YES ☐ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT: ☐ YES ☐ NO

FIRE: ☐ YES ☐ NO

NUMBER PERSONS INJURED

NUMBER OF FATALITIES

PROPERTY DAMAGE EST $

POLICE REPORT FILED: ☐ YES ☐ NO

THREAD CAME OFF COMPLETELY ON THE RIGHT FRONT TIRE. TT

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93–579

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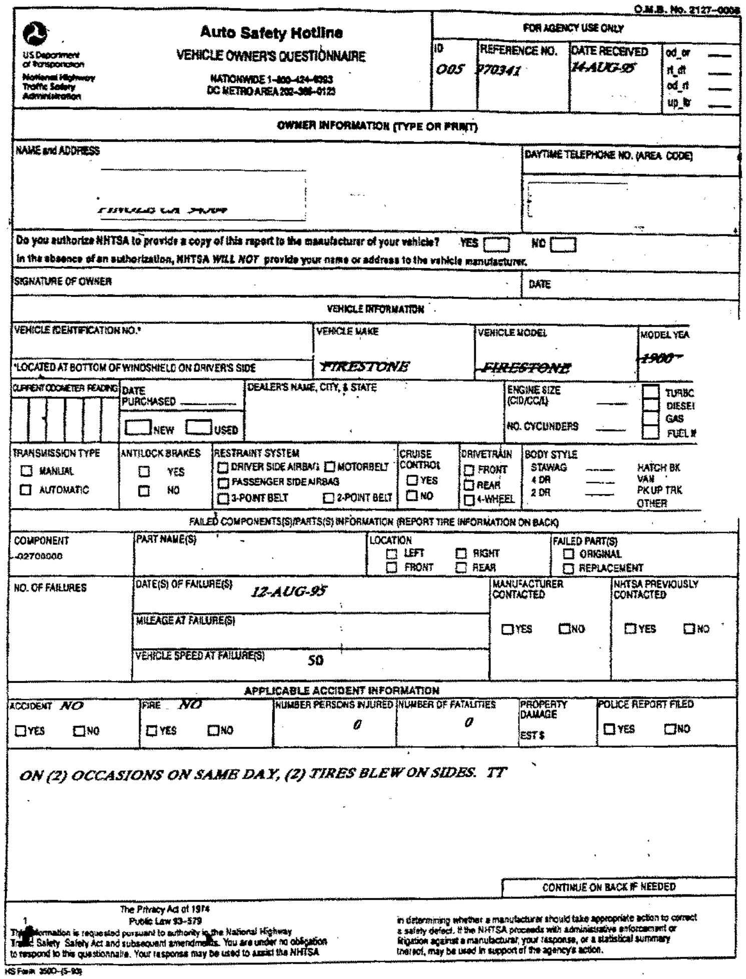
HS Form 350D–(5–93)



O.M.B. No. 2127-0008

U.S. Department of Transportation
National Highway Traffic Safety Administration

Auto Safety Hotline

VEHICLE OWNER'S QUESTIONNAIRE

NATIONWIDE 1-800-424-9393
DC METRO AREA 202-366-0123

FOR AGENCY USE ONLY

ID	REFERENCE NO.	DATE RECEIVED	
005	970341	14-AUG-95	od_or ___ rt_dt ___ od_rt ___ up_lr ___

OWNER INFORMATION (TYPE OR PRINT)

NAME and ADDRESS

[illegible]

DAYTIME TELEPHONE NO. (AREA CODE)

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☐ NO ☐
In the absence of an authorization, NHTSA *WILL NOT* provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER

DATE

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.*	VEHICLE MAKE	VEHICLE MODEL	MODEL YEA
*LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE	FIRESTONE	FIRESTONE	1900

CURRENT ODOMETER READING	DATE PURCHASED ______	DEALER'S NAME, CITY, & STATE	ENGINE SIZE (CID/CC/L) ___ NO. CYLINDERS ___	☐ TURBC ☐ DIESEI ☐ GAS ☐ FUEL #
	☐ NEW ☐ USED			

TRANSMISSION TYPE	ANTILOCK BRAKES	RESTRAINT SYSTEM	CRUISE CONTROL	DRIVETRAIN	BODY STYLE
☐ MANUAL ☐ AUTOMATIC	☐ YES ☐ NO	☐ DRIVER SIDE AIRBAG ☐ MOTORBELT ☐ PASSENGER SIDE AIRBAG ☐ 3-POINT BELT ☐ 2-POINT BELT	☐ YES ☐ NO	☐ FRONT ☐ REAR ☐ 4-WHEEL	STA/WAG ___ HATCH BK 4 DR ___ VAN 2 DR ___ PK UP TRK OTHER

FAILED COMPONENTS(S)/PARTS(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT	PART NAME(S)	LOCATION	FAILED PART(S)
02700000		☐ LEFT ☐ RIGHT ☐ FRONT ☐ REAR	☐ ORIGINAL ☐ REPLACEMENT

NO. OF FAILURES		MANUFACTURER CONTACTED	NHTSA PREVIOUSLY CONTACTED
	DATE(S) OF FAILURE(S) 12-AUG-95 MILEAGE AT FAILURE(S) VEHICLE SPEED AT FAILURE(S) 50	☐ YES ☐ NO	☐ YES ☐ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT NO	FIRE NO	NUMBER PERSONS INJURED	NUMBER OF FATALITIES	PROPERTY DAMAGE	POLICE REPORT FILED
☐ YES ☐ NO	☐ YES ☐ NO	0	0	EST $	☐ YES ☐ NO

ON (2) OCCASIONS ON SAME DAY, (2) TIRES BLEW ON SIDES. TT

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93-579

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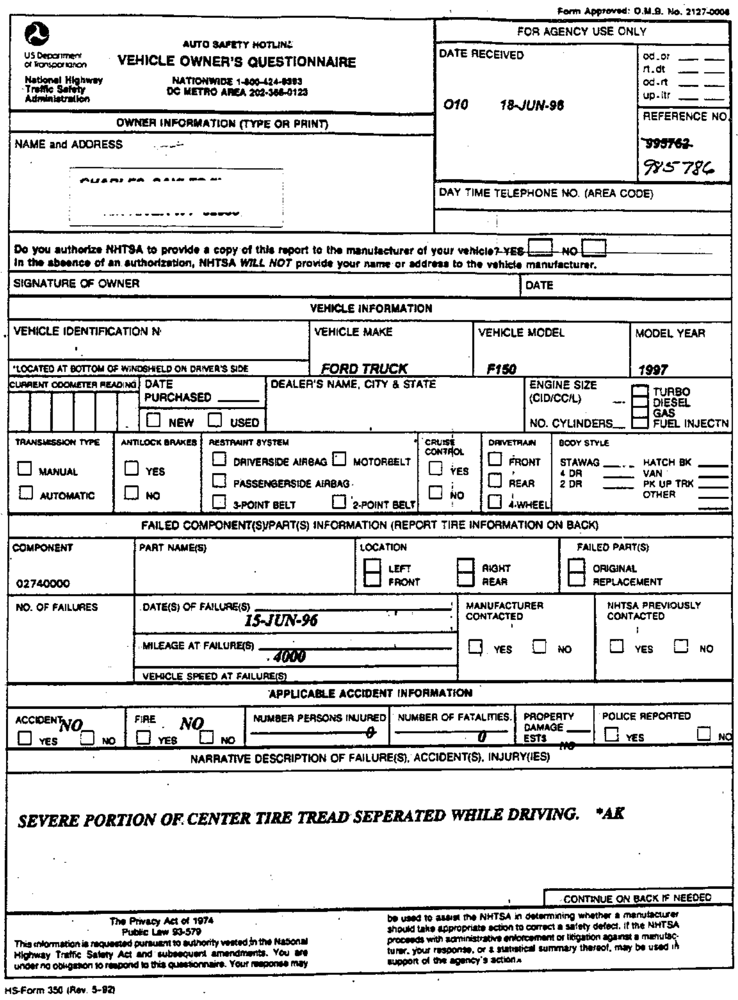
HS Form 350D-(5-93)



Form Approved: O.M.B. No. 2127-0008

US Department of Transportation
National Highway Traffic Safety Administration

AUTO SAFETY HOTLINE
VEHICLE OWNER'S QUESTIONNAIRE
NATIONWIDE 1-800-424-9393
DC METRO AREA 202-366-0123

FOR AGENCY USE ONLY
DATE RECEIVED
010 18-JUN-96
od.or ___ ___
rt.dt ___ ___
od.rt ___ ___
up.itr ___ ___
REFERENCE NO.
~~995762~~
985786

OWNER INFORMATION (TYPE OR PRINT)
NAME and ADDRESS
[redacted]

DAY TIME TELEPHONE NO. (AREA CODE)

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☐ NO ☐
In the absence of an authorization, NHTSA *WILL NOT* provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER
DATE

VEHICLE INFORMATION

VEHICLE IDENTIFICATION N *LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE	VEHICLE MAKE FORD TRUCK	VEHICLE MODEL F150	MODEL YEAR 1997

CURRENT ODOMETER READING
DATE PURCHASED ______ ☐ NEW ☐ USED
DEALER'S NAME, CITY & STATE
ENGINE SIZE (CID/CC/L) ___
NO. CYLINDERS ___
☐ TURBO
☐ DIESEL
☐ GAS
☐ FUEL INJECTN

TRANSMISSION TYPE: ☐ MANUAL ☐ AUTOMATIC
ANTILOCK BRAKES: ☐ YES ☐ NO
RESTRAINT SYSTEM: ☐ DRIVERSIDE AIRBAG ☐ MOTORBELT ☐ PASSENGERSIDE AIRBAG ☐ 3-POINT BELT ☐ 2-POINT BELT
CRUISE CONTROL: ☐ YES ☐ NO
DRIVETRAIN: ☐ FRONT ☐ REAR ☐ 4-WHEEL
BODY STYLE: STAWAG ___ 4 DR ___ 2 DR ___ HATCH BK ___ VAN ___ PK UP TRK ___ OTHER ___

FAILED COMPONENT(S)/PART(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT
02740000
PART NAME(S)
LOCATION: ☐ LEFT ☐ FRONT ☐ RIGHT ☐ REAR
FAILED PART(S): ☐ ORIGINAL ☐ REPLACEMENT

NO. OF FAILURES
DATE(S) OF FAILURE(S) 15-JUN-96
MILEAGE AT FAILURE(S) 4000
VEHICLE SPEED AT FAILURE(S)
MANUFACTURER CONTACTED ☐ YES ☐ NO
NHTSA PREVIOUSLY CONTACTED ☐ YES ☐ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT NO ☐ YES ☐ NO
FIRE NO ☐ YES ☐ NO
NUMBER PERSONS INJURED 0
NUMBER OF FATALITIES 0
PROPERTY DAMAGE ESTS NO
POLICE REPORTED ☐ YES ☐ NO

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJURY(IES)

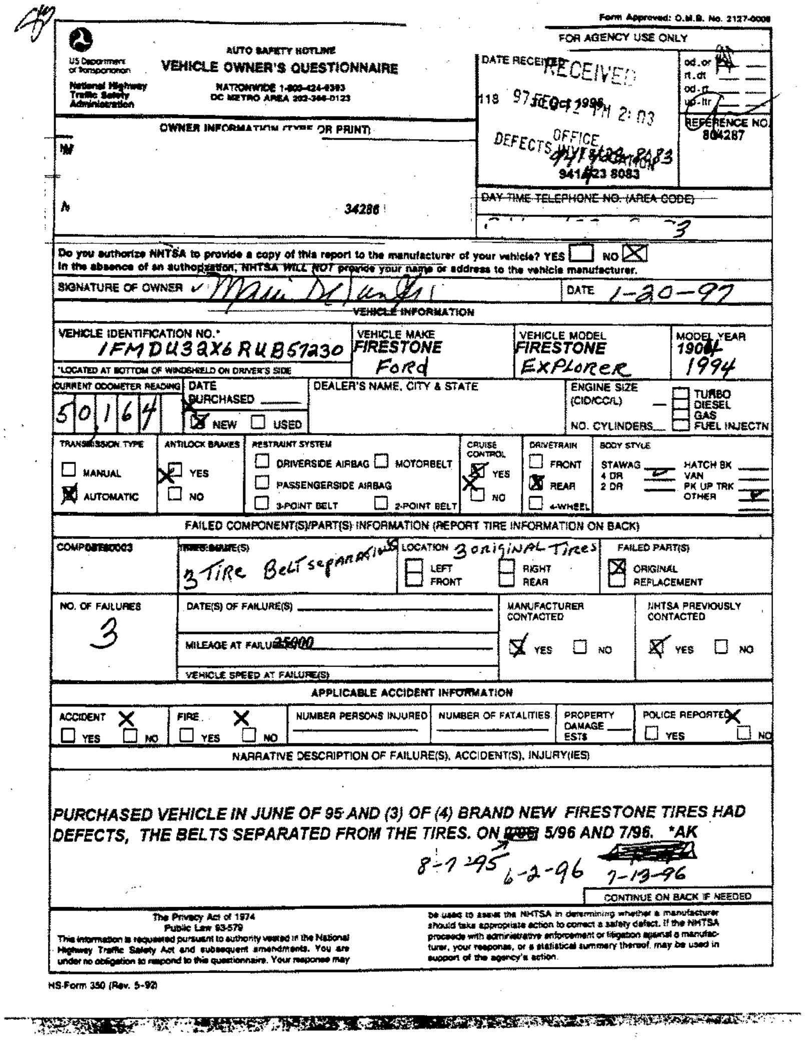
SEVERE PORTION OF CENTER TIRE TREAD SEPERATED WHILE DRIVING. *AK

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93-579

This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.

HS-Form 350 (Rev. 5-92)



Form Approved: O.M.B. No. 2127-0008

US Department of Transportation
National Highway Traffic Safety Administration

AUTO SAFETY HOTLINE
VEHICLE OWNER'S QUESTIONNAIRE
NATIONWIDE 1-800-424-9393
DC METRO AREA 202-366-0123

FOR AGENCY USE ONLY

DATE RECEIVED RECEIVED
118 97 FEB 12 PM 2:03 Oct 1996
OFFICE OF DEFECTS INVESTIGATION
941 423 8083
od.or
rt.dt
od.rt
up-ltr
REFERENCE NO. 804287

OWNER INFORMATION (TYPE OR PRINT)

34286

~~DAY TIME TELEPHONE NO. (AREA CODE)~~

3

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☐ NO ☒
In the absence of an authorization, NHTSA WILL NOT provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER ✓ DATE 1-20-97

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.* 1FMDU32X6RUB57230 *LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE	VEHICLE MAKE FIRESTONE Ford	VEHICLE MODEL FIRESTONE Explorer	MODEL YEAR ~~1904~~ 1994
CURRENT ODOMETER READING 50164	DATE PURCHASED ____ ☒ NEW ☐ USED	DEALER'S NAME, CITY & STATE	ENGINE SIZE (CID/CC/L) __ NO. CYLINDERS__ ☐ TURBO ☐ DIESEL ☐ GAS ☐ FUEL INJECTN

TRANSMISSION TYPE ☐ MANUAL ☒ AUTOMATIC	ANTILOCK BRAKES ☒ YES ☐ NO	RESTRAINT SYSTEM ☐ DRIVERSIDE AIRBAG ☐ MOTORBELT ☐ PASSENGERSIDE AIRBAG ☐ 3-POINT BELT ☐ 2-POINT BELT	CRUISE CONTROL ☒ YES ☐ NO	DRIVETRAIN ☐ FRONT ☒ REAR ☐ 4-WHEEL	BODY STYLE STAWAG ✓ HATCH BK __ 4 DR __ VAN __ 2 DR __ PK UP TRK __ OTHER ✓

FAILED COMPONENT(S)/PART(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT	NAME(S) 3 Tire Belt separations	LOCATION 3 original Tires ☐ LEFT FRONT ☐ RIGHT REAR	FAILED PART(S) ☒ ORIGINAL ☐ REPLACEMENT
NO. OF FAILURES 3	DATE(S) OF FAILURE(S) ____ MILEAGE AT FAILURE 25000 VEHICLE SPEED AT FAILURE(S)	MANUFACTURER CONTACTED ☒ YES ☐ NO	NHTSA PREVIOUSLY CONTACTED ☒ YES ☐ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT ✗ ☐ YES ☐ NO	FIRE ✗ ☐ YES ☐ NO	NUMBER PERSONS INJURED	NUMBER OF FATALITIES	PROPERTY DAMAGE ESTS ____	POLICE REPORTED ✗ ☐ YES ☐ NO

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJURY(IES)

*PURCHASED VEHICLE IN JUNE OF 95 AND (3) OF (4) BRAND NEW FIRESTONE TIRES HAD DEFECTS, THE BELTS SEPARATED FROM THE TIRES. ON ~~[illegible]~~ 5/96 AND 7/96. *AK*

8-1-95 6-2-96 7-13-96

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93-579

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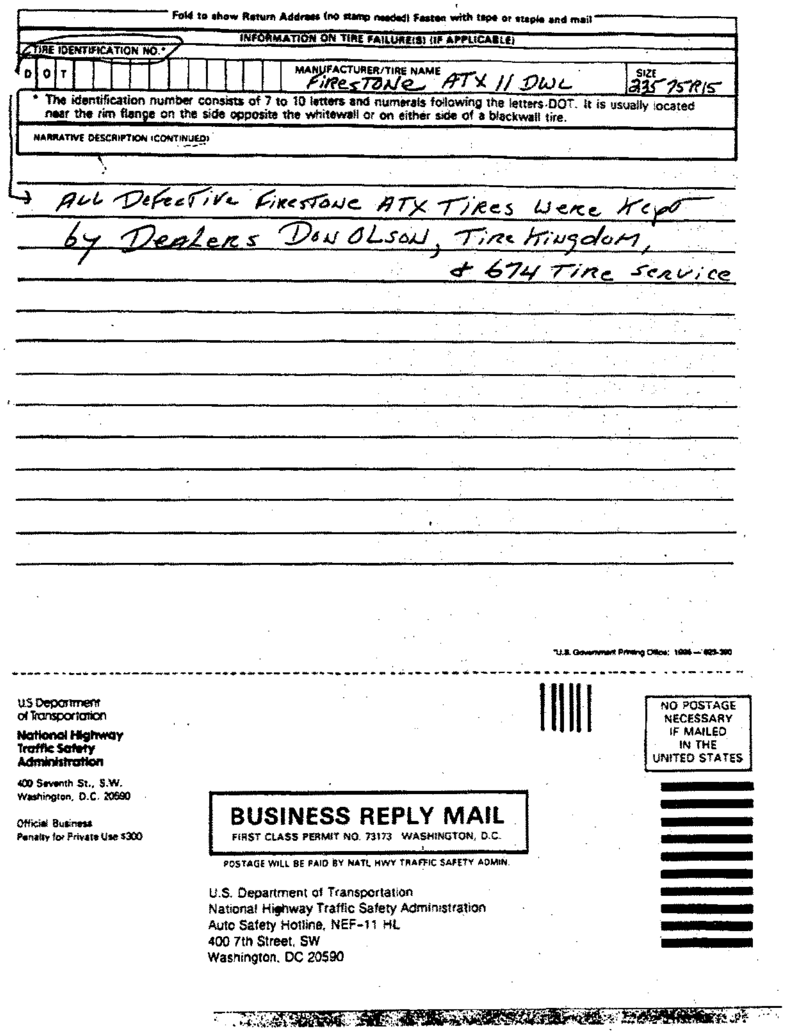
HS Form 350 (Rev. 5-92)



Fold to show Return Address (no stamp needed) Fasten with tape or staple and mail

INFORMATION ON TIRE FAILURE(S) (IF APPLICABLE)

TIRE IDENTIFICATION NO.*

D O T

MANUFACTURER/TIRE NAME Firestone ATX II DWL

SIZE 235 75R15

* The identification number consists of 7 to 10 letters and numerals following the letters DOT. It is usually located near the rim flange on the side opposite the whitewall or on either side of a blackwall tire.

NARRATIVE DESCRIPTION (CONTINUED)

All Defective Firestone ATX Tires were Kept by Dealers Don Olson, Tire Kingdom, & 674 Tire Service

*U.S. Government Printing Office: 1996 — [illegible]

US Department of Transportation
National Highway Traffic Safety Administration
400 Seventh St., S.W.
Washington, D.C. 20590

Official Business
Penalty for Private Use $300

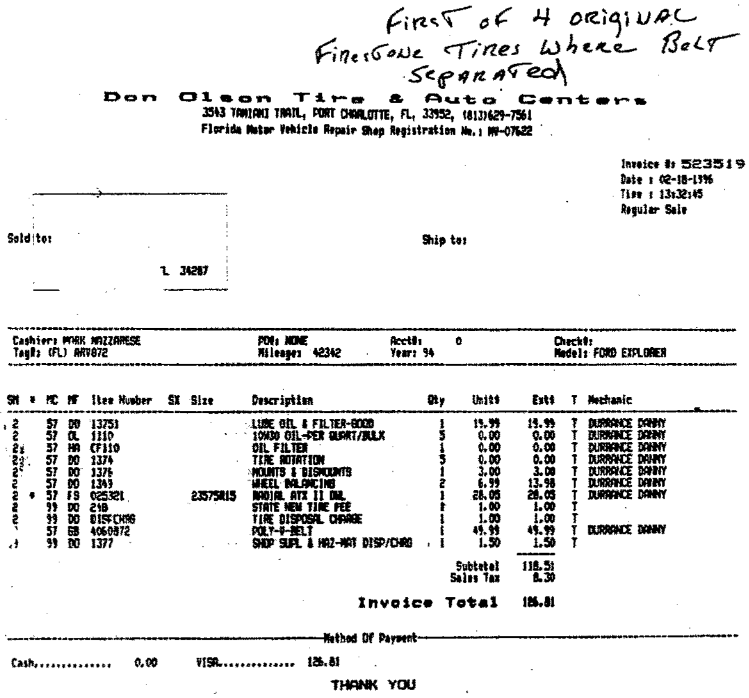
NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 73173 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY NATL HWY TRAFFIC SAFETY ADMIN.

U.S. Department of Transportation
National Highway Traffic Safety Administration
Auto Safety Hotline, NEF-11 HL
400 7th Street, SW
Washington, DC 20590



First of 4 original Firestone Tires where Belt Separated

Don Olson Tire & Auto Centers
3543 TAMIAMI TRAIL, PORT CHARLOTTE, FL, 33952, (813)629-7561
Florida Motor Vehicle Repair Shop Registration No.: MV-07622

Invoice #: 523519
Date : 02-18-1996
Time : 13:32:45
Regular Sale

Sold to:

L 34287

Ship to:

Cashier: MARK NAZZARESE
Tag#: (FL) ARV872

PO#: NONE
Mileage: 42342

Acct#: 0
Year: 94

Check#:
Model: FORD EXPLORER

SM	*	MC	MF	Item Number	SX	Size	Description	Qty	Unit$	Ext$	T	Mechanic
2		57	DO	13751			LUBE OIL & FILTER-GOOD	1	19.99	19.99	T	DURRANCE DANNY
2		57	OL	1110			10W30 OIL-PER QUART/BULK	5	0.00	0.00	T	DURRANCE DANNY
2		57	HA	CF110			OIL FILTER	1	0.00	0.00	T	DURRANCE DANNY
2		57	DO	1374			TIRE ROTATION	5	0.00	0.00	T	DURRANCE DANNY
2		57	DO	1376			MOUNTS & DISMOUNTS	1	3.00	3.00	T	DURRANCE DANNY
2		57	DO	1349			WHEEL BALANCING	2	6.99	13.98	T	DURRANCE DANNY
2	*	57	FS	025321		23575R15	RADIAL ATX II OWL	1	28.05	28.05	T	DURRANCE DANNY
2		99	DO	218			STATE NEW TIRE FEE	1	1.00	1.00	T	
2		99	DO	DISFCHRG			TIRE DISPOSAL CHARGE	1	1.00	1.00	T	
		57	GB	4060872			POLY-V-BELT	1	49.99	49.99	T	DURRANCE DANNY
		99	DO	1377			SHOP SUPL & HAZ-MAT DISP/CHRG	1	1.50	1.50	T	

Subtotal 118.51
Sales Tax 8.30

Invoice Total 126.81

Method Of Payment

Cash............... 0.00 VISA.............. 126.81

THANK YOU

WSA 1342 NBR

519525
RECEIVED
JUN 17 97 2:3
OFFICE DEFECTS INVESTIGATION
POSTED

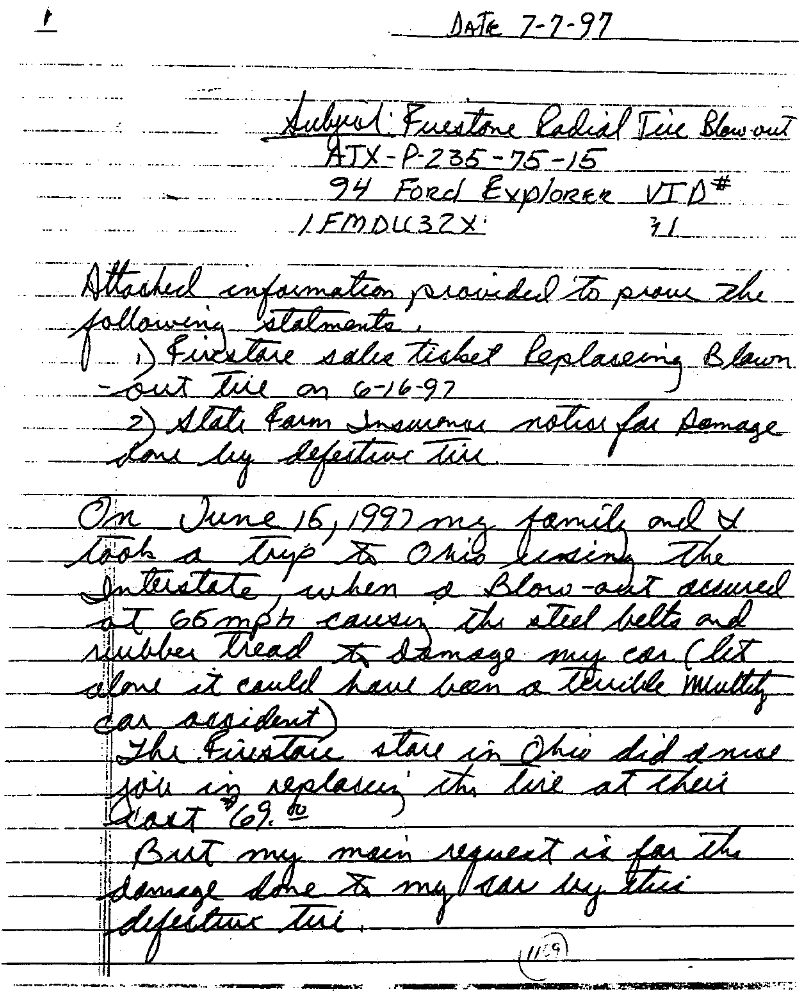
CC:

1) Ford Customer Assistance Center
300 Renaissance Center
P.O. Box 43360
Detroit Michigan 48243

2) Administrator National Highway Traffic Safety Administration
400 Seventh Street S.W.
Washington, D.C. 20590

3) Rubber Manufacturers Assoc.
1400 K Street N.W.
Washington. DC. 20005

(MAIN) TO: FIRESTONE S.E. REGION
SERVICE CENTER #200
1745 CORPORATE DRIVE
NORCROSS, GA. 30093



1

DATE 7-7-97

Subject: Firestone Radial Tire Blow-out
ATX-P-235-75-15
94 Ford Explorer VID#
1FMDU32X 31

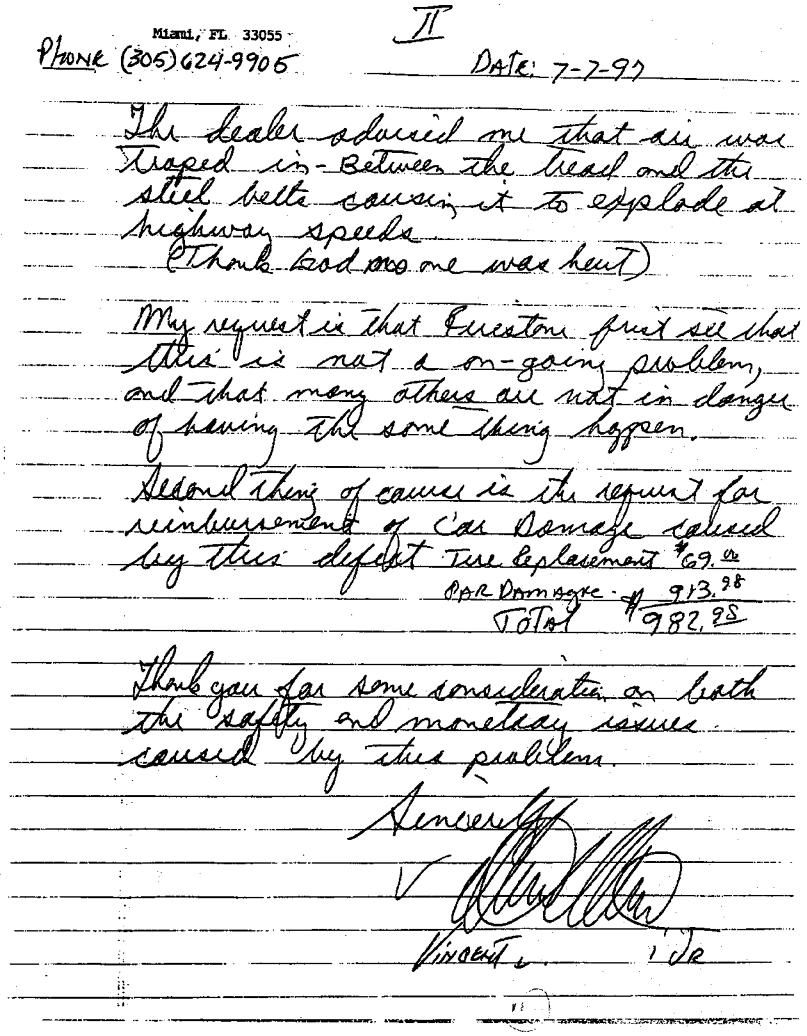
Attached information provided to prove the following statments.
1) Firestore sales ticket Replaceing Blown-out tire on 6-16-97
2) State Farm Insurance notise for Damage done by defective tire

On June 16, 1997 my family and I took a trip to Ohio using the Interstate, when a Blow-out accured at 65 mph causing the steel belts and rubber tread to damage my car (let alone it could have been a terrible multy car accident)

The Firestore store in Ohio did a nice job in replacing the tire at their cost $69.00

But my main request is for the damage done to my car by their defective tire.

1109



Miami, FL 33055

II

Phone (305)624-9905

Date: 7-7-97

The dealer advised me that air was traped in-Between the tread and the steel belts causing it to explode at highway speeds
(Thank God no one was hurt)

My request is that Firestone first see that this is not a on-going problem, and that many others are not in danger of having the same thing happen.

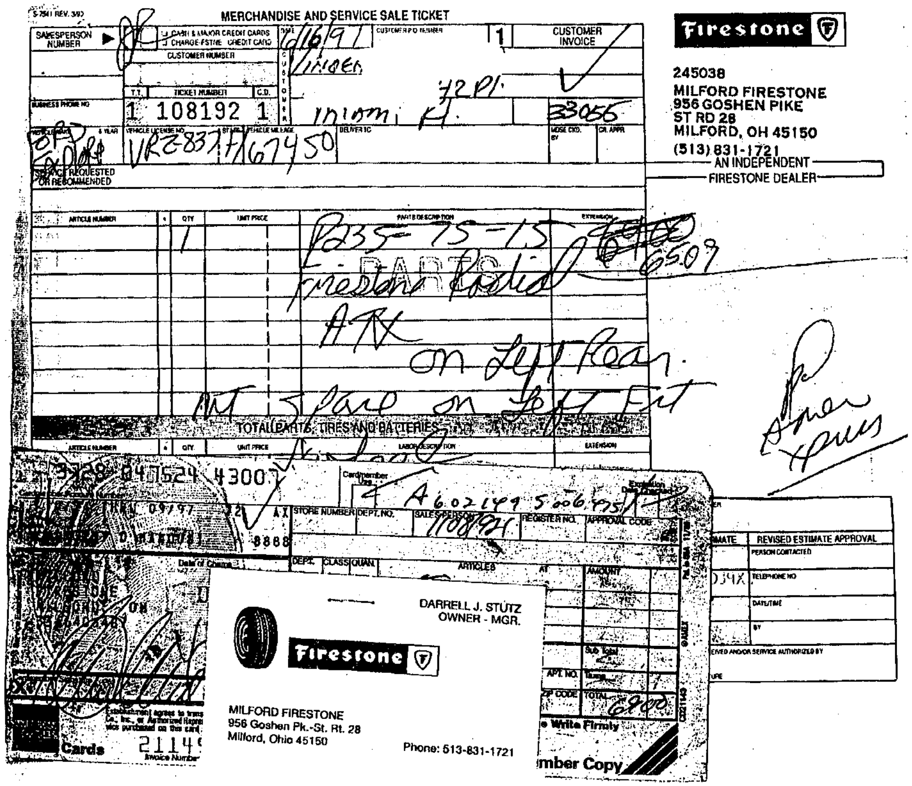
Second thing of cause is the request for reimbursement of Car Damage caused by this defect Tire Replacement $69.00
Car Damage $913.98
Total $982.95

Thank you for some consideration on both the safety and monetary issues caused by this problem.

Sincerely

V

Vincent Jr



S-7541 REV. 3/92

MERCHANDISE AND SERVICE SALE TICKET

SALESPERSON NUMBER ▶	☐ CASH & MAJOR CREDIT CARDS ☐ CHARGE-FSTNE CREDIT CARD	DATE 6/16/97	CUSTOMER P.O. NUMBER 1
CUSTOMER NUMBER	CUSTOMER Linden		CUSTOMER INVOICE ✓
T.T. 1	TICKET NUMBER 108192	C.D. 1	72 Pl.
BUSINESS PHONE NO		Miami, K.	33056
VEHICLE MAKE & YEAR 87 Explore	VEHICLE LICENSE NO. VRZ837	ST. FL	VEHICLE MILEAGE 67450

SERVICE REQUESTED OR RECOMMENDED

ARTICLE NUMBER	QTY	UNIT PRICE	PARTS DESCRIPTION	EXTENSION
	1		P235-75-15	~~6400~~ 6509
			Firestone Radial	
			ATX	
			on left Rear.	
			Put Spare on left Fr.	
TOTAL PARTS, TIRES AND BATTERIES				
ARTICLE NUMBER	QTY	UNIT PRICE	LABOR DESCRIPTION	EXTENSION

Firestone

245038
MILFORD FIRESTONE
956 GOSHEN PIKE
ST RD 28
MILFORD, OH 45150
(513) 831-1721
AN INDEPENDENT
FIRESTONE DEALER

REVISED ESTIMATE APPROVAL
PERSON CONTACTED
TELEPHONE NO
DATE/TIME
BY
ADDITIONAL SERVICE AUTHORIZED BY

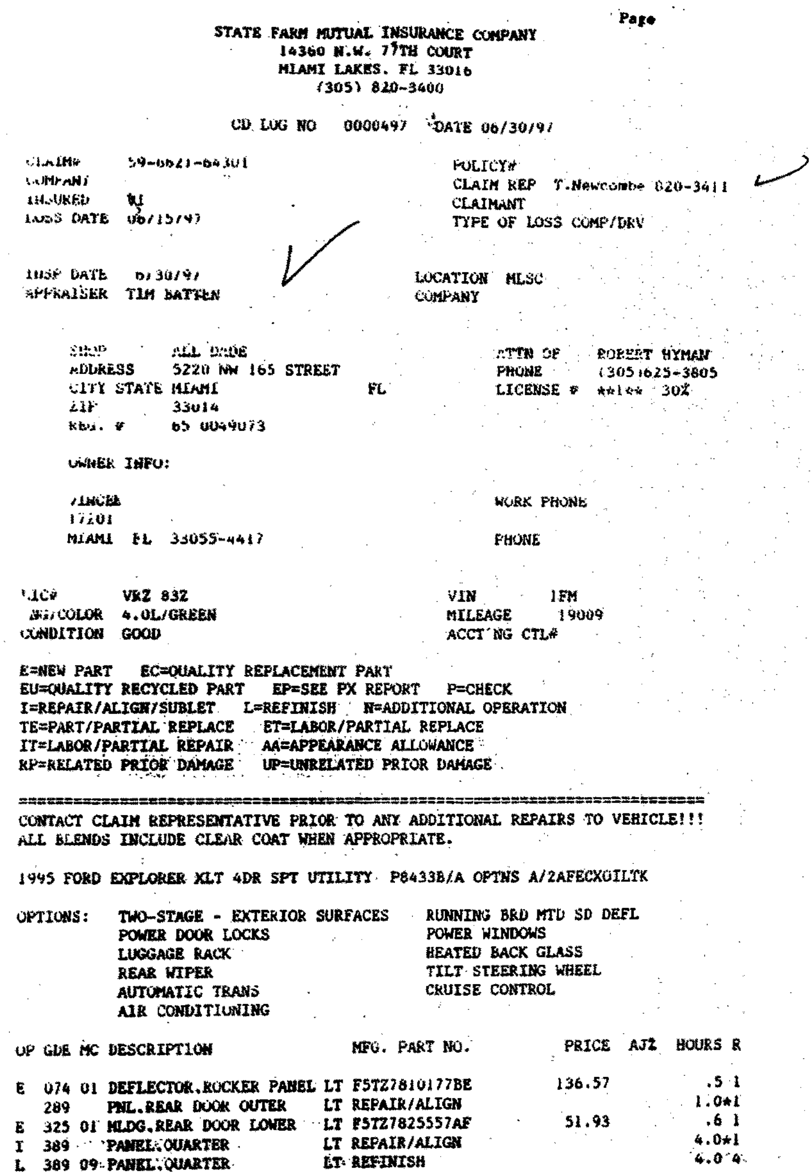
3728 047524 43007
09/97 AX
8888
Cardmember Use
A602149 5006 4751
Expiration Date Checked
STORE NUMBER | DEPT. NO. | SALESPERSON 1108921 | REGISTER NO. | APPROVAL CODE
Date of Charge
DEPT. | CLASS | QUAN. | ARTICLES | AT | AMOUNT
Sub Total
Taxes
TOTAL 69.00
Please Write Firmly
Cardmember Copy
Cards
Invoice Number 2114

DARRELL J. STUTZ
OWNER - MGR.

Firestone

MILFORD FIRESTONE
956 Goshen Pk.-St. Rt. 28
Milford, Ohio 45150

Phone: 513-831-1721



Page

STATE FARM MUTUAL INSURANCE COMPANY
14360 N.W. 77TH COURT
MIAMI LAKES, FL 33016
(305) 820-3400

CD LOG NO 0000497 DATE 06/30/97

CLAIM# 59-0621-64301
COMPANY
INSURED WI
LOSS DATE 06/15/97

POLICY#
CLAIM REP T.Newcombe 820-3411
CLAIMANT
TYPE OF LOSS COMP/DRV

INSP DATE 06/30/97
APPRAISER TIM BATTEN

LOCATION MLSC
COMPANY

SHOP ALL DADE
ADDRESS 5220 NW 165 STREET
CITY STATE MIAMI FL
ZIP 33014
REG. # 65 0049073

ATTN OF ROBERT HYMAN
PHONE (305)625-3805
LICENSE # **1** 30%

OWNER INFO:

/INGER
17201
MIAMI FL 33055-4417

WORK PHONE

PHONE

LIC# VKZ 832
ENG/COLOR 4.0L/GREEN
CONDITION GOOD

VIN 1FM
MILEAGE 19009
ACCT'NG CTL#

E=NEW PART EC=QUALITY REPLACEMENT PART
EU=QUALITY RECYCLED PART EP=SEE PX REPORT P=CHECK
I=REPAIR/ALIGN/SUBLET L=REFINISH N=ADDITIONAL OPERATION
TE=PART/PARTIAL REPLACE ET=LABOR/PARTIAL REPLACE
IT=LABOR/PARTIAL REPAIR AA=APPEARANCE ALLOWANCE
RP=RELATED PRIOR DAMAGE UP=UNRELATED PRIOR DAMAGE

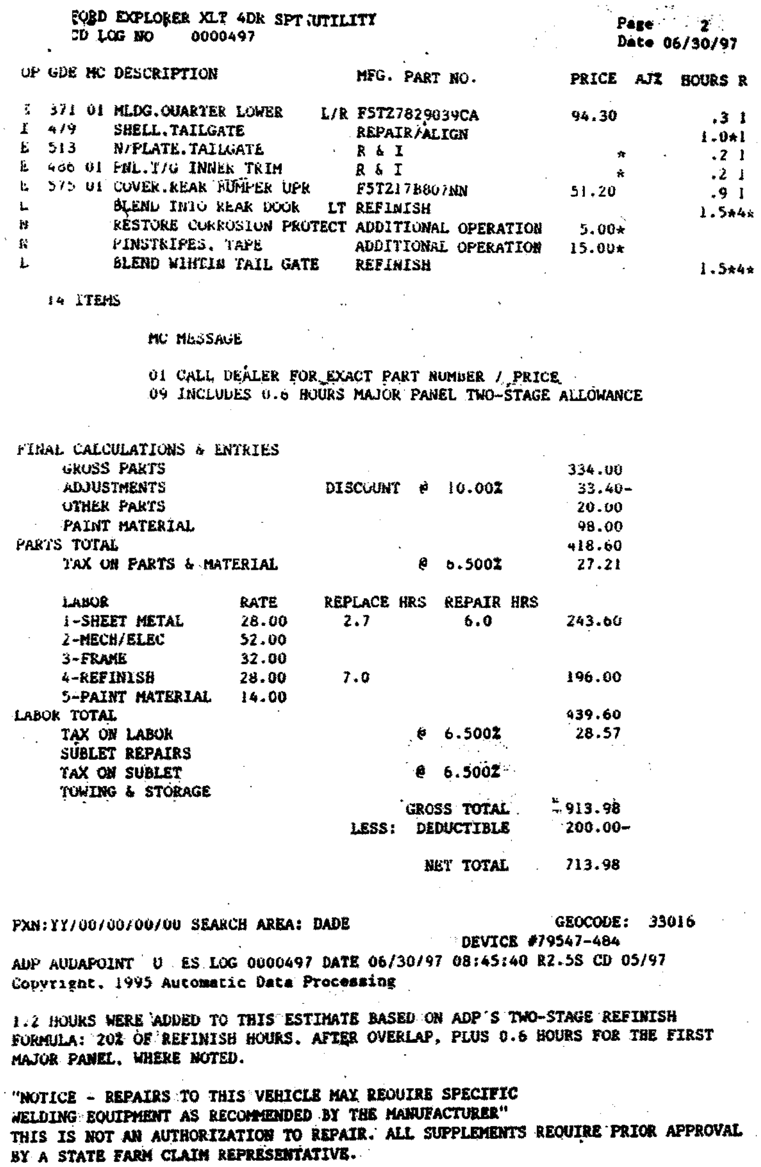
===

CONTACT CLAIM REPRESENTATIVE PRIOR TO ANY ADDITIONAL REPAIRS TO VEHICLE!!!
ALL BLENDS INCLUDE CLEAR COAT WHEN APPROPRIATE.

1995 FORD EXPLORER XLT 4DR SPT UTILITY P8433B/A OPTNS A/2AFECXOILTK

OPTIONS:		
	TWO-STAGE - EXTERIOR SURFACES	RUNNING BRD MTD SD DEFL
	POWER DOOR LOCKS	POWER WINDOWS
	LUGGAGE RACK	HEATED BACK GLASS
	REAR WIPER	TILT STEERING WHEEL
	AUTOMATIC TRANS	CRUISE CONTROL
	AIR CONDITIONING	

OP	GDE	MC	DESCRIPTION		MFG. PART NO.	PRICE	AJ%	HOURS	R
E	074	01	DEFLECTOR,ROCKER PANEL	LT	F5TZ7810177BE	136.57		.5	1
	289		PNL,REAR DOOR OUTER	LT	REPAIR/ALIGN			1.0*	1
E	325	01	MLDG,REAR DOOR LOWER	LT	F5TZ7825557AF	51.93		.6	1
I	389		PANEL,QUARTER	LT	REPAIR/ALIGN			4.0*	1
L	389	09	PANEL,QUARTER	LT	REFINISH			4.0	4



```
     FORD EXPLORER XLT 4DR SPT UTILITY                            Page    2
     CD LOG NO     0000497                                        Date 06/30/97

OP GDE MC DESCRIPTION                 MFG. PART NO.             PRICE  AJ%  HOURS R

E  371 01 MLDG.QUARTER LOWER     L/R F5TZ7829039CA              94.30            .3 1
I  479    SHELL.TAILGATE             REPAIR/ALIGN                              1.0*1
E  513    N/PLATE.TAILGATE           R & I                          *            .2 1
E  466 01 PNL.T/G INNER TRIM         R & I                          *            .2 1
E  575 01 COVER.REAR BUMPER UPR      F5TZ17B807NN               51.20            .9 1
L         BLEND INTO REAR DOOR    LT REFINISH                                  1.5*4*
N         RESTORE CORROSION PROTECT ADDITIONAL OPERATION         5.00*
R         PINSTRIPES, TAPE           ADDITIONAL OPERATION       15.00*
L         BLEND WIHTIN TAIL GATE     REFINISH                                  1.5*4*

  14 ITEMS

             MC MESSAGE

             01 CALL DEALER FOR EXACT PART NUMBER / PRICE
             09 INCLUDES 0.6 HOURS MAJOR PANEL TWO-STAGE ALLOWANCE


FINAL CALCULATIONS & ENTRIES
     GROSS PARTS                                               334.00
     ADJUSTMENTS                    DISCOUNT  @  10.00%         33.40-
     OTHER PARTS                                                20.00
     PAINT MATERIAL                                             98.00
PARTS TOTAL                                                    418.60
     TAX ON PARTS & MATERIAL                 @  6.500%          27.21

     LABOR              RATE      REPLACE HRS  REPAIR HRS
     1-SHEET METAL      28.00       2.7          6.0           243.60
     2-MECH/ELEC        52.00
     3-FRAME            32.00
     4-REFINISH         28.00       7.0                        196.00
     5-PAINT MATERIAL   14.00
LABOR TOTAL                                                    439.60
     TAX ON LABOR                            @  6.500%          28.57
     SUBLET REPAIRS
     TAX ON SUBLET                           @  6.500%
     TOWING & STORAGE
                                         GROSS TOTAL           913.98
                                   LESS:  DEDUCTIBLE           200.00-

                                           NET TOTAL           713.98


PXN:YY/00/00/00/00 SEARCH AREA: DADE                        GEOCODE:  33016
                                                      DEVICE #79547-484
ADP AUDAPOINT  U  ES LOG 0000497 DATE 06/30/97 08:45:40 R2.5S CD 05/97
Copyright, 1995 Automatic Data Processing

1.2 HOURS WERE ADDED TO THIS ESTIMATE BASED ON ADP'S TWO-STAGE REFINISH
FORMULA: 20% OF REFINISH HOURS, AFTER OVERLAP, PLUS 0.6 HOURS FOR THE FIRST
MAJOR PANEL, WHERE NOTED.

"NOTICE - REPAIRS TO THIS VEHICLE MAY REQUIRE SPECIFIC
WELDING EQUIPMENT AS RECOMMENDED BY THE MANUFACTURER"
THIS IS NOT AN AUTHORIZATION TO REPAIR. ALL SUPPLEMENTS REQUIRE PRIOR APPROVAL
BY A STATE FARM CLAIM REPRESENTATIVE.
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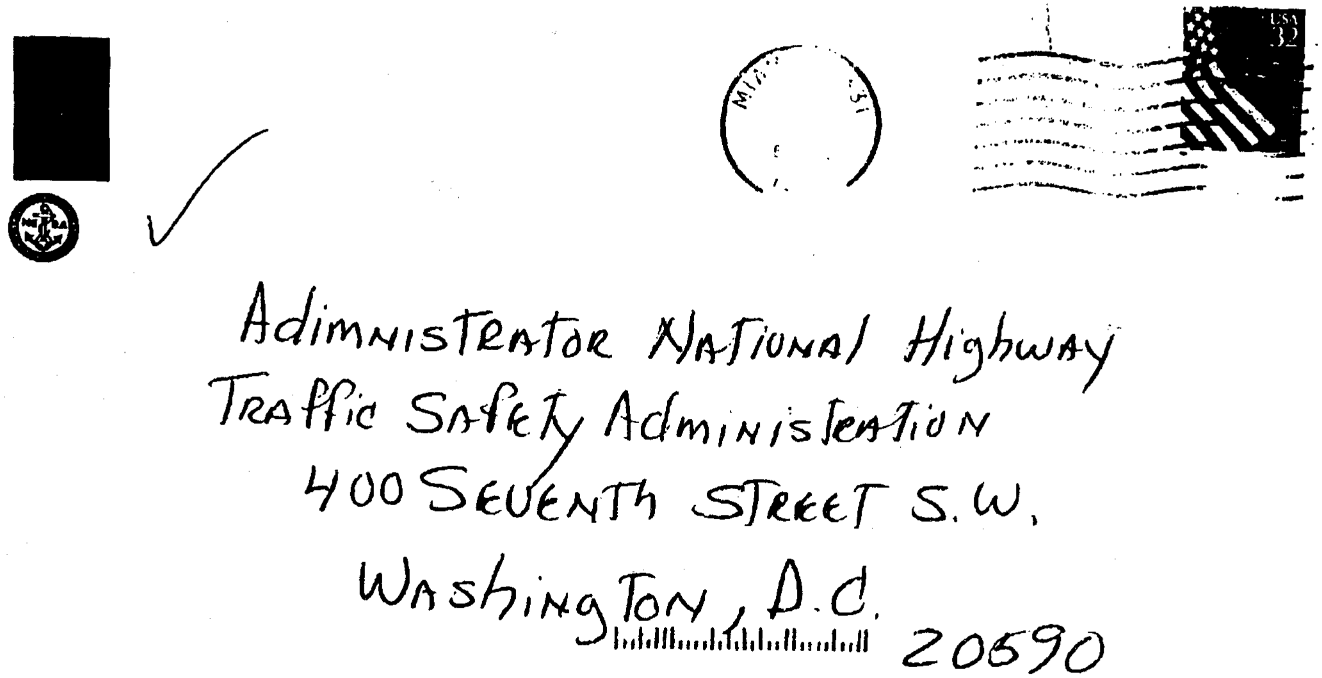


[redacted]

Adimnistrator National Highway
Traffic Safety Administration
400 Seventh Street S.W.
Washington, D.C. 20590

522 641

From: nobody@dotnews.nhtsa.dot.gov
To: hubsmtp.gwhub("voq-rep@dotnews.nhtsa.dot.gov")
Date: 8/14/97 9:19pm
Subject: WWW VOQ Submission

VEHICLE OWNER'S QUESTIONAIRE

SUBMISSION TIME: Thu, 14 Aug 1997 21:17:11

OWNER INFORMATION

NAME:

ADDRESS:

TELEPHONE:

Have NHTSA send signature card for authorization: No

VEHICLE INFORMATION

VIN: 1FMC
MAKE: Ford
MODEL: Explorer Sport
YEAR: 1992

ODOMETER: 56,402
PURCHASE DATE: 1/31/92
NEW OR USED: Used

DEALER NAME: Jack Roach Ford
ADDRESS: Houston, Tx

ENGINE SIZE:
CYLINDERS: 6

FUEL INJECTION:
TURBO:
FUEL TYPE: Gas
ANTILOCK BRAKES:
CRUISE CONTROL: Yes
DRIVETRAIN:
DRIVER AIRBAG:
PASSENGER AIRBAG:
3-POINT BELT:
MOTOR BELT:
2-POINT BELT:
BODY STYLE: Other

FAILED COMPONENT(S)/PART(S) INFORMATION

COMPONENT: Tires

PART NAME(S): Firestone ATX Tires

LOCATION: Right Rear

NUMBER OF FAILURES:

DATE(S) OF FAILURES: 8-4-97

MILEAGE AT FAILURE(S): 56409

SPEED AT FAILURE(S): 65 mph

MANUFATURER CONTACTED: No

NHTSA CONTACTED: No

APPLICABLE ACCIDENT INFORMATION

ACCIDENT: Yes
FIRE:

DRIVER SIDE AIRBAG DEPLOYED: NA
PASSENGER SIDE AIRBAG DEPLOYED: NA

NUMBER OF PERSONS INJURED:
NUMBER OF FATALITIES:
ESTIMATED PROPERTY DAMAGE: $7-8,000.00

REPORTED TO POLICE: Yes

INFORMATION ON TIRE FAILURE(S) (IF APPLICABLE)

DOT NUMBER: DOT
TIRE MANUFACTURER: Firestone
TIRE NAME: ATX
TIRE SIZE:

ADDITIONAL COMMENTS

I had heard about several accidents with these tires and had mine checked by a tire company and firestone and were told they were still good. In late July I had air conditioning work done at Penske and asked about the tires and was told they were fine. The tread appeared in good shape. I was driving home and the tread came off, I lost control of the vehicle, hit an 18 wheeler, crossed the median toward oncoming traffice and managed to get the car stopped without flipping. I don't want this horrible experience to happen to anyone else. I believe Firestone should be held accountable and the tires should be recalled. From what I understand the naked eye cannot detect the defective tire.

ND OF FORM

7.20.99v1

Internet IVOQ Analysis Form

ODINO: [redacted]

Name:

Address:

City State zipcode

Make: FORD TRUCK

Model: EXPLORER

Year: 1992

Component: 02740000

U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

~~TIME: Thu, 14 Aug 1997~~ 21:17:11

REFERENCE NUMBER 52264 ✓
ODI NO

Dear Consumer:

Thank you for your recent contact with the National Highway Traffic Safety Administration (NHTSA) via the Internet. The information you have provided may assist in our investigative efforts to identify safety defects in vehicles, items of motor vehicle equipment (such as child safety seats), or tires. When it is determined that a defect exists, we are authorized to order manufacturers to recall and repair the vehicle or items or motor vehicle equipment. We can act only when such defects appear in a group of vehicles and represent an unreasonable risk to motor vehicle safety.

We will provide the manufacturer with the information you provided in your communication with us. Our contact and transmittal often results in a satisfactory solution of individual problems. However, we are prohibited by the Privacy Act from disclosing to anyone, including manufacturers, a consumer's personal identifier such as name, address, and telephone number. When submitting a consumer's information to manufacturers, we are required to remove personal identifiers from the documents *unless* the consumer explicitly and clearly states that the information may be provided. Please indicate and sign below if you authorize us to disclose your name, address, and other personal information to the manufacturer. Please fold and staple or tape the form so that the pre-addressed portion is on the outside. You may include copies of repair bills, letters to the manufacturer, or any other documents you feel are relevant to the report you previously submitted.

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? **[✓ YES]** **NO** ___

SIGNATURE OF OWNER ____________________

Get it together!
SAFETY BELTS SAVE LIVES

AUTO SAFETY HOTLINE
(800) 424-9393
Wash. D.C. Area (202) 366-0123

Fold to show Return Address *(no stamp needed)* Fasten with tape or staple and mail

Narrative Description

See attached correspondence

Fold

U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

400 7th St., SW.
Washington, DC 20590

Official Business
Penalty for Private Use $300

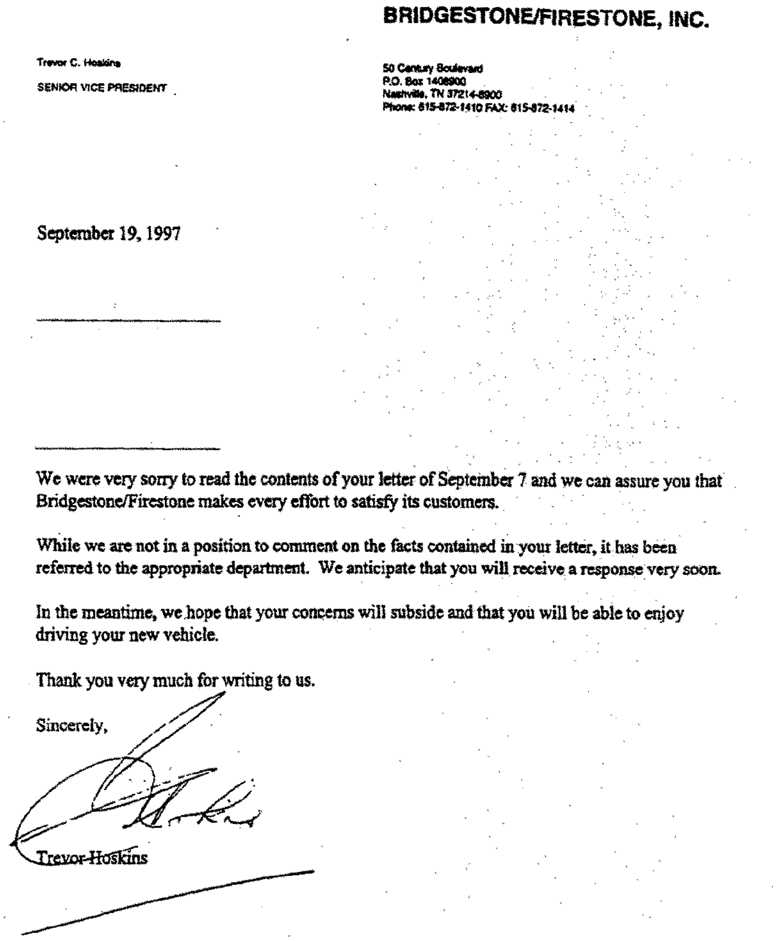
NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 73173 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY NATL. HWY. TRAFFIC SAFETY ADMIN.

**U.S. Department of Transportation
National Highway Traffic Safety Administration
Auto Safety Hotline, NEF-11 HL
400 7th Street, SW.
Washington, D.C. 20590**



BRIDGESTONE/FIRESTONE, INC.

Trevor C. Hoskins

SENIOR VICE PRESIDENT

50 Century Boulevard
P.O. Box 1408900
Nashville, TN 37214-8900
Phone: 615-872-1410 FAX: 615-872-1414

September 19, 1997

We were very sorry to read the contents of your letter of September 7 and we can assure you that Bridgestone/Firestone makes every effort to satisfy its customers.

While we are not in a position to comment on the facts contained in your letter, it has been referred to the appropriate department. We anticipate that you will receive a response very soon.

In the meantime, we hope that your concerns will subside and that you will be able to enjoy driving your new vehicle.

Thank you very much for writing to us.

Sincerely,

Trevor Hoskins

PE

September 7, 1997

Mr. Trevor C. Hoskins
Sr. Vice President - Public Affairs Department
Bridgestone/Firestone, Inc.
50 Century Blvd.
Nashville, TN 37214

Dear Mr. Hoskins:

It has taken me over a month to write this letter. I have been so upset and angry that I had to wait until I was able to control my emotions and express my feelings in a responsible manner.

On August 4, 1997, I was driving home from work, outbound on Highway 288, when suddenly I lost control of my 1992 Ford Explorer. I hit an 18 wheeler and bounced off of his truck - twice. I then crossed the median of Highway 288 toward oncoming traffic and somehow managed to control the vehicle in the median and ended up on the shoulder parallel with the inbound lanes. I don't know how, but the vehicle did not flip over. When I got out of the car, my front driver side tire had blown and I thought that was the cause of the accident. When all of the witnesses stopped to see if I was alive, it was apparent that the front tire was not the problem. It was my rear passenger side tire that had lost the tread and caused the accident.

It was really ironic because I had been concerned over the Firestone ATX tires since November, 1996 when the local news aired several stories about accidents with these tires and the number of fatalities that had occurred. I was so scared of the tires that I had them inspected at Strouhalls in November, 1996 and was told they had plenty of tread and did not need to be replaced. Still concerned, I went to the Firestone store at 5800 Westheimer, Houston, Texas on November 22, 1996 and had them inspected again. A copy of the invoice is enclosed. Again I was told they were fine, had plenty of tread and did not need to be replaced. Both inspections were done at tire dealers who could have easily sold me new tires if they had thought there was a problem.

My car was inspected for the state inspection sticker in January, 1997 and again there was no problem with the tires. On July 24, 1997, I had $540 air conditioning work done on the vehicle at Penske and again was told the tires were fine and did not need to be replaced. A copy of the invoice is enclosed, which shows I had 56,128 miles on the vehicle. Then on August 4, 1997, the tire fell apart. Everyone at the scene of the accident was horrified at what could have happened. No one thought I should be alive and could not believe that the vehicle did not flip over and kill me.

I do not understand why Firestone has not recalled these tires. I have talked with several attorneys who believe I have a lawsuit against Firestone for what happened. I do not want to pursue that option but do want to prevent other people from experiencing what happened to me. My insurance company, State Farm, is investigating the tire and the accident. I received $10,800 for my vehicle and it cost me $24,000 for a new car. I was not very happy! Because of your tires, I was forced to buy a new vehicle. I will tell you that my new Ford Explorer does not have Firestone tires at my insistence.

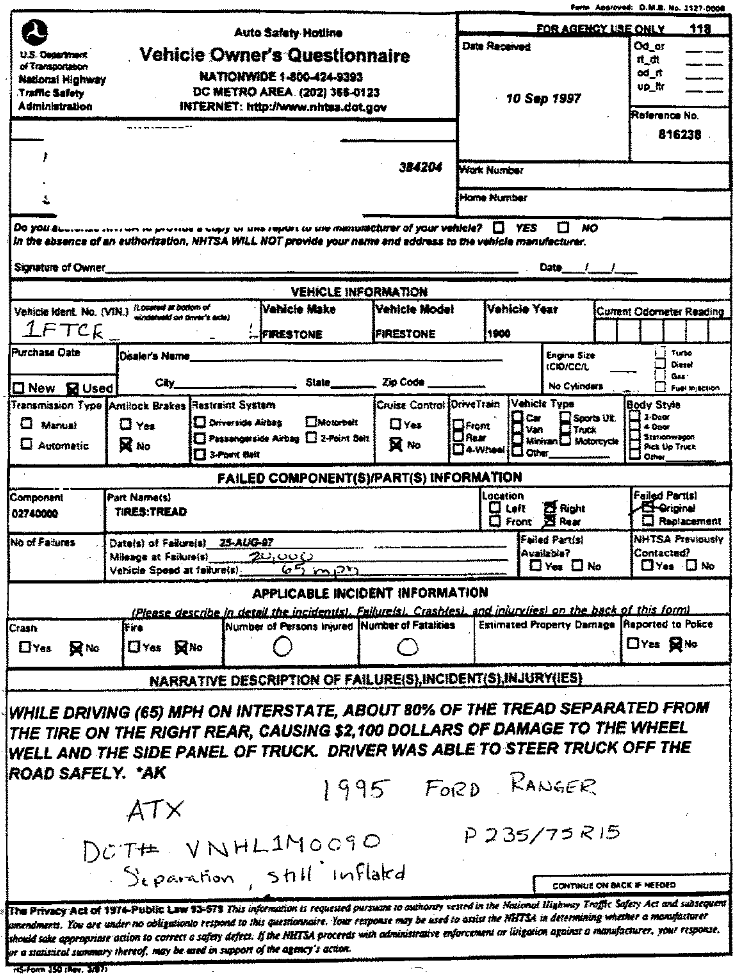
I have and will continue to tell everyone I can, that these tires are a hazard and should be recalled. I truly believe that Firestone knows there is a problem and refuses to acknowledge the problem because of your liability. I cannot believe that the people at Firestone will not take responsibility for the problems associated with these tires. I would not want the blood on my hand if I were an employee of your company.

I would appreciate your response in writing and what action your company will take with regard to this problem. If I do not receive a reasonable response and action from Firestone, I will be forced to take legal action and pursue my options with additional media coverage. I am out $13,200 and many hours of pain and agony from this accident which could have been prevented if Firestone had taken the proper action. I still have problems driving and am paranoid of all the other vehicle on the road that have these Firestone ATX tires. It was very fortunate that my accident did not cause damage or death to the people and vehicles around me.

I have enclosed pictures of my totaled vehicle. As you can see, the tires do not reflect any problems except the tire that fell apart. I have pieces of the tread that came off and the tire was confiscated by the insurance company for analysis.

Your prompt response is requested..

Sincerely,



Form Approved: O.M.B. No. 2127-0008

U.S. Department of Transportation
National Highway Traffic Safety Administration

Auto Safety Hotline
Vehicle Owner's Questionnaire
NATIONWIDE 1-800-424-9393
DC METRO AREA (202) 366-0123
INTERNET: http://www.nhtsa.dot.gov

FOR AGENCY USE ONLY 118

Date Received: 10 Sep 1997

Od_or ___
rt_dt ___
od_rt ___
up_ltr ___

Reference No. 816238

384204

Work Number

Home Number

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? ☐ *YES* ☐ *NO*
In the absence of an authorization, NHTSA WILL NOT provide your name and address to the vehicle manufacturer.

Signature of Owner______________________ Date___/___/___

VEHICLE INFORMATION

Vehicle Ident. No. (VIN.) (Located at bottom of windshield on driver's side)	Vehicle Make	Vehicle Model	Vehicle Year	Current Odometer Reading
1FTCR	FIRESTONE	FIRESTONE	1900	

Purchase Date
☐ New ☒ Used

Dealer's Name______________________
City__________ State______ Zip Code______

Engine Size (CID/CC/L ___
No Cylinders ___
☐ Turbo ☐ Diesel ☐ Gas ☐ Fuel injection

Transmission Type	Antilock Brakes	Restraint System	Cruise Control	DriveTrain	Vehicle Type	Body Style
☐ Manual ☐ Automatic	☐ Yes ☒ No	☐ Driverside Airbag ☐ Passengerside Airbag ☐ 3-Point Belt ☐ Motorbelt ☐ 2-Point Belt	☐ Yes ☒ No	☐ Front ☐ Rear ☐ 4-Wheel	☐ Car ☐ Van ☐ Minivan ☐ Other____ ☐ Sports Ut. ☐ Truck ☐ Motorcycle	☐ 2-Door ☐ 4 Door ☐ Stationwagon ☐ Pick Up Truck ☐ Other____

FAILED COMPONENT(S)/PART(S) INFORMATION

Component 02740000	Part Name(s) TIRES:TREAD	Location ☐ Left ☒ Right ☐ Front ☒ Rear	Failed Part(s) ☒ Original ☐ Replacement
No of Failures	Date(s) of Failure(s) 25-AUG-97 Mileage at Failure(s) 20,000 Vehicle Speed at failure(s) 65 mph	Failed Part(s) Available? ☐ Yes ☐ No	NHTSA Previously Contacted? ☐ Yes ☐ No

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies) on the back of this form)

Crash	Fire	Number of Persons Injured	Number of Fatalities	Estimated Property Damage	Reported to Police
☐ Yes ☒ No	☐ Yes ☒ No	0	0		☐ Yes ☒ No

NARRATIVE DESCRIPTION OF FAILURE(S),INCIDENT(S),INJURY(IES)

WHILE DRIVING (65) MPH ON INTERSTATE, ABOUT 80% OF THE TREAD SEPARATED FROM THE TIRE ON THE RIGHT REAR, CAUSING $2,100 DOLLARS OF DAMAGE TO THE WHEEL WELL AND THE SIDE PANEL OF TRUCK. DRIVER WAS ABLE TO STEER TRUCK OFF THE ROAD SAFELY. *AK

1995 FORD RANGER

ATX

DOT# VNHL1M0090

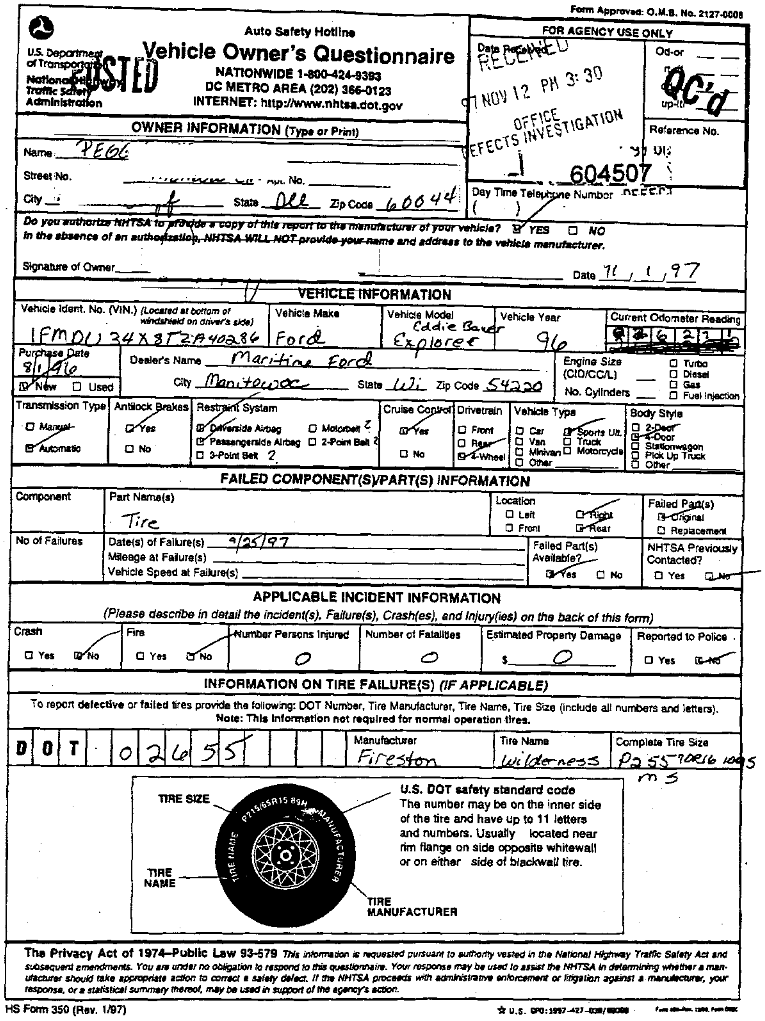
P 235/75 R15

Separation, still inflated

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974-Public Law 93-579 *This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligationto respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.*

HS-Form 350 (Rev. 3/97)



Form Approved: O.M.B. No. 2127-0008

U.S. Department of Transportation
National Highway Traffic Safety Administration

POSTED

Auto Safety Hotline

Vehicle Owner's Questionnaire

NATIONWIDE 1-800-424-9393
DC METRO AREA (202) 366-0123
INTERNET: http://www.nhtsa.dot.gov

FOR AGENCY USE ONLY

Date Received RECEIVED
97 NOV 12 PM 3:30
OFFICE
DEFECTS INVESTIGATION

604507

Od-or
QC'd
up-ld

Reference No.

OWNER INFORMATION (Type or Print)

Name PEGG

Street No. [illegible] Apt. No.

City State Ill Zip Code 60044

Day Time Telephone Number ( )

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? ☒ YES ☐ NO
In the absence of an authorization, NHTSA WILL NOT provide your name and address to the vehicle manufacturer.

Signature of Owner Date 11 / 1 / 97

VEHICLE INFORMATION

Vehicle Ident. No. (VIN.) *(Located at bottom of windshield on driver's side)* 1FMDU34X8TZA40286
Vehicle Make Ford
Vehicle Model Eddie Bauer Explorer
Vehicle Year 96
Current Odometer Reading [illegible] 6 2 1 [illegible]

Purchase Date 8/1/96
☒ New ☐ Used

Dealer's Name Maritime Ford
City Manitowoc State Wi Zip Code 54220

Engine Size (CID/CC/L) ___
No. Cylinders ___
☐ Turbo ☐ Diesel ☐ Gas ☐ Fuel Injection

Transmission Type: ☐ Manual ☒ Automatic

Antilock Brakes: ☒ Yes ☐ No

Restraint System: ☒ Driverside Airbag ☒ Passengerside Airbag ☐ 3-Point Belt 2 ☐ Motorbelt 2 ☐ 2-Point Belt 2

Cruise Control: ☒ Yes ☐ No

Drivetrain: ☐ Front ☐ Rear ☒ 4-Wheel

Vehicle Type: ☐ Car ☐ Van ☐ Minivan ☐ Other ☒ Sports Ult. ☐ Truck ☐ Motorcycle

Body Style: ☐ 2-Door ☒ 4-Door ☐ Stationwagon ☐ Pick Up Truck ☐ Other

FAILED COMPONENT(S)/PART(S) INFORMATION

Component
Part Name(s) Tire
Location: ☐ Left ☐ Front ☒ Right ☒ Rear
Failed Part(s): ☒ Original ☐ Replacement

No of Failures
Date(s) of Failure(s) 9/25/97
Mileage at Failure(s)
Vehicle Speed at Failure(s)
Failed Part(s) Available? ☒ Yes ☐ No
NHTSA Previously Contacted? ☐ Yes ☒ No

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and Injury(ies) on the back of this form)

Crash: ☐ Yes ☒ No
Fire: ☐ Yes ☒ No
Number Persons Injured 0
Number of Fatalities 0
Estimated Property Damage $ 0
Reported to Police: ☐ Yes ☒ No

INFORMATION ON TIRE FAILURE(S) *(IF APPLICABLE)*

To report defective or failed tires provide the following: DOT Number, Tire Manufacturer, Tire Name, Tire Size (include all numbers and letters).
Note: This information not required for normal operation tires.

D O T · 0 2 6 5 5

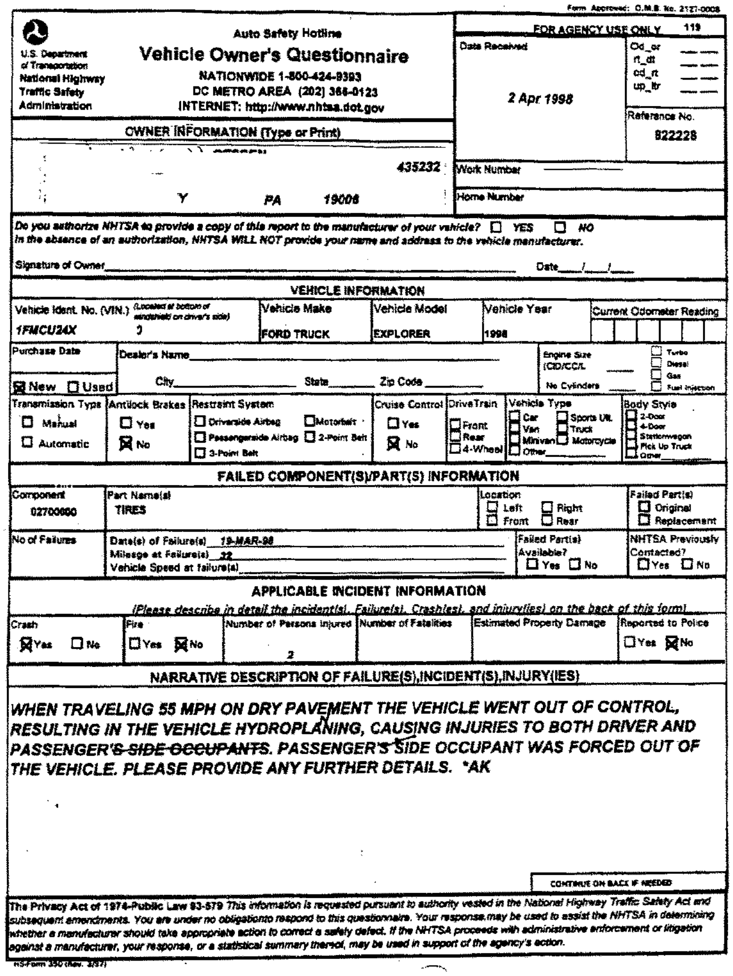
Manufacturer Fireston
Tire Name Wilderness
Complete Tire Size P255 70R16 109S m S

U.S. DOT safety standard code
The number may be on the inner side of the tire and have up to 11 letters and numbers. Usually located near rim flange on side opposite whitewall or on either side of blackwall tire.

The Privacy Act of 1974—Public Law 93-579 *This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.*

HS Form 350 (Rev. 1/97)

☆ U.S. GPO:1997-427-[illegible]



Form Approved: O.M.B. No. 2127-0008

U.S. Department of Transportation
National Highway Traffic Safety Administration

Auto Safety Hotline

Vehicle Owner's Questionnaire

NATIONWIDE 1-800-424-9393
DC METRO AREA (202) 366-0123
INTERNET: http://www.nhtsa.dot.gov

FOR AGENCY USE ONLY 119

Date Received: 2 Apr 1998

Od_or ___
rt_dt ___
cd_rt ___
up_ltr ___

Reference No. 822228

OWNER INFORMATION (Type or Print)

435232

Y PA 19008

Work Number ______

Home Number

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? ☐ *YES* ☐ *NO*
In the absence of an authorization, NHTSA WILL NOT provide your name and address to the vehicle manufacturer.

Signature of Owner ______ Date ___/___/___

VEHICLE INFORMATION

Vehicle Ident. No. (VIN.) (Located at bottom of windshield on driver's side)	Vehicle Make	Vehicle Model	Vehicle Year	Current Odometer Reading
1FMCU24X)	FORD TRUCK	EXPLORER	1998	

Purchase Date
☒ New ☐ Used

Dealer's Name ______
City ______ State ______ Zip Code ______

Engine Size (CID/CC/L ______
No Cylinders ______
☐ Turbo
☐ Diesel
☐ Gas
☐ Fuel Injection

Transmission Type	Antilock Brakes	Restraint System	Cruise Control	DriveTrain	Vehicle Type	Body Style
☐ Manual ☐ Automatic	☐ Yes ☒ No	☐ Driverside Airbag ☐ Motorbelt ☐ Passengerside Airbag ☐ 2-Point Belt ☐ 3-Point Belt	☐ Yes ☒ No	☐ Front ☐ Rear ☐ 4-Wheel	☐ Car ☐ Sports Util. ☐ Van ☐ Truck ☐ Minivan ☐ Motorcycle ☐ Other ______	☐ 2-Door ☐ 4-Door ☐ Stationwagon ☐ Pick Up Truck ☐ Other ______

FAILED COMPONENT(S)/PART(S) INFORMATION

Component	Part Name(s)	Location	Failed Part(s)
02700000	TIRES	☐ Left ☐ Right ☐ Front ☐ Rear	☐ Original ☐ Replacement

No of Failures

Date(s) of Failure(s) 19-MAR-98
Mileage at Failure(s) 22
Vehicle Speed at failure(s) ______

Failed Part(s) Available? ☐ Yes ☐ No

NHTSA Previously Contacted? ☐ Yes ☐ No

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies) on the back of this form)

Crash	Fire	Number of Persons Injured	Number of Fatalities	Estimated Property Damage	Reported to Police
☒ Yes ☐ No	☐ Yes ☒ No	2			☐ Yes ☒ No

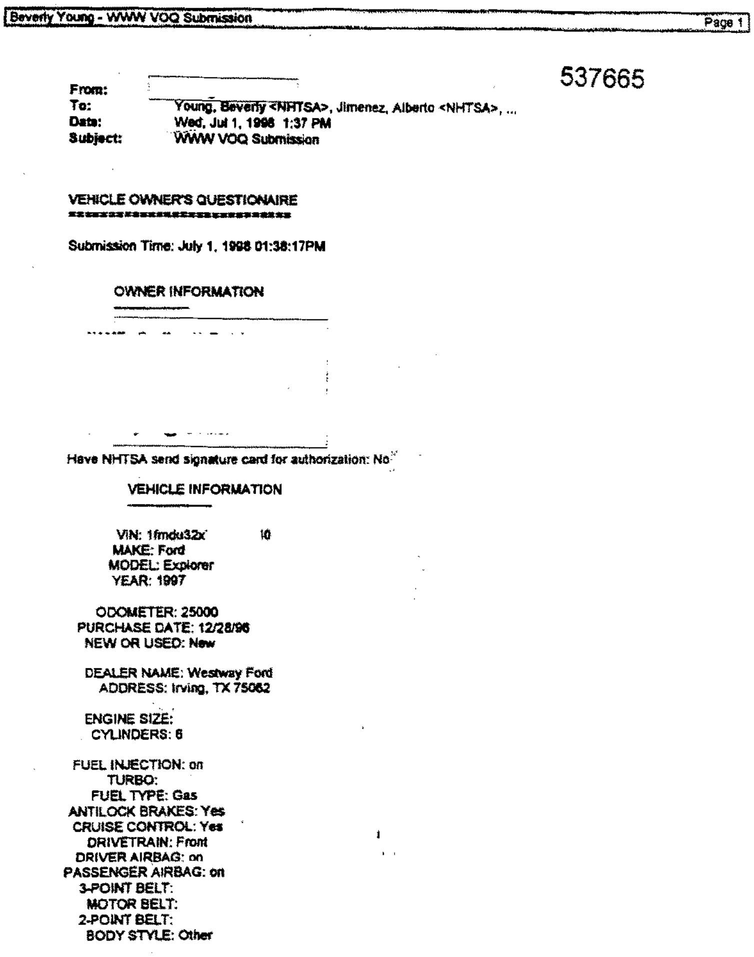
NARRATIVE DESCRIPTION OF FAILURE(S),INCIDENT(S),INJURY(IES)

*WHEN TRAVELING 55 MPH ON DRY PAVEMENT THE VEHICLE WENT OUT OF CONTROL, RESULTING IN THE VEHICLE HYDROPLANING, CAUSING INJURIES TO BOTH DRIVER AND PASSENGER'~~S SIDE OCCUPANTS~~. PASSENGER'S SIDE OCCUPANT WAS FORCED OUT OF THE VEHICLE. PLEASE PROVIDE ANY FURTHER DETAILS. *AK*

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974-Public Law 93-579 This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligationto respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.

HS-Form 350 (Rev. 3/97)



Beverly Young - WWW VOQ Submission Page 1

537665

From: [redacted]
To: Young, Beverly <NHTSA>, Jimenez, Alberto <NHTSA>, ...
Date: Wed, Jul 1, 1998 1:37 PM
Subject: WWW VOQ Submission

VEHICLE OWNER'S QUESTIONAIRE
==========================

Submission Time: July 1, 1998 01:38:17PM

OWNER INFORMATION

[redacted]

Have NHTSA send signature card for authorization: No

VEHICLE INFORMATION

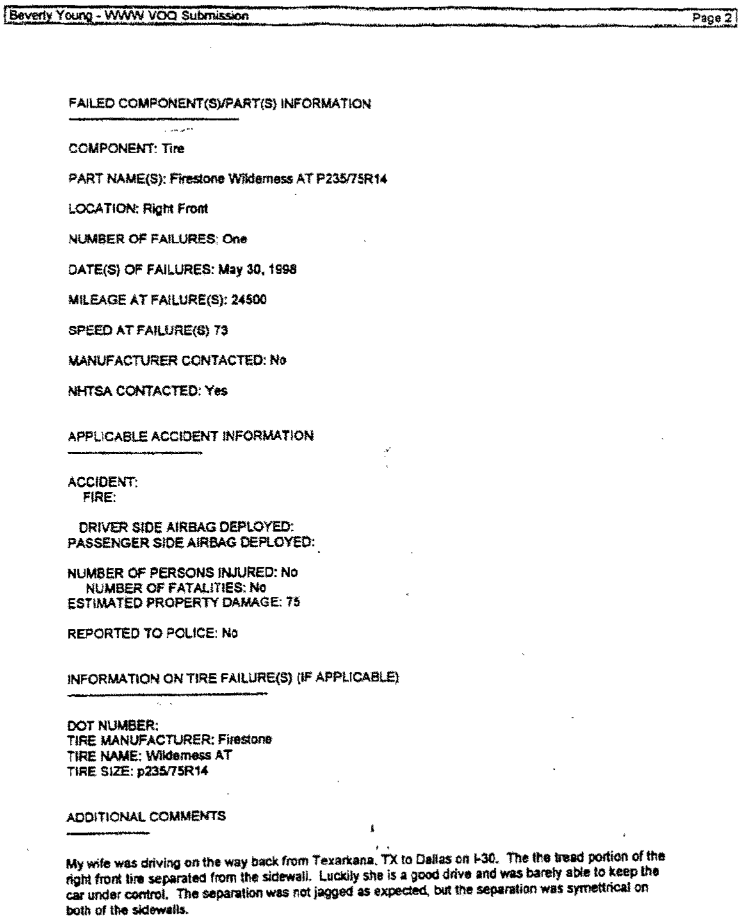
VIN: 1fmdu32x[redacted]10
MAKE: Ford
MODEL: Explorer
YEAR: 1997

ODOMETER: 25000
PURCHASE DATE: 12/28/96
NEW OR USED: New

DEALER NAME: Westway Ford
ADDRESS: Irving, TX 75062

ENGINE SIZE:
CYLINDERS: 6

FUEL INJECTION: on
TURBO:
FUEL TYPE: Gas
ANTILOCK BRAKES: Yes
CRUISE CONTROL: Yes
DRIVETRAIN: Front
DRIVER AIRBAG: on
PASSENGER AIRBAG: on
3-POINT BELT:
MOTOR BELT:
2-POINT BELT:
BODY STYLE: Other



FAILED COMPONENT(S)/PART(S) INFORMATION

COMPONENT: Tire

PART NAME(S): Firestone Wilderness AT P235/75R14

LOCATION: Right Front

NUMBER OF FAILURES: One

DATE(S) OF FAILURES: May 30, 1998

MILEAGE AT FAILURE(S): 24500

SPEED AT FAILURE(S) 73

MANUFACTURER CONTACTED: No

NHTSA CONTACTED: Yes

APPLICABLE ACCIDENT INFORMATION

ACCIDENT:
FIRE:

DRIVER SIDE AIRBAG DEPLOYED:
PASSENGER SIDE AIRBAG DEPLOYED:

NUMBER OF PERSONS INJURED: No
NUMBER OF FATALITIES: No
ESTIMATED PROPERTY DAMAGE: 75

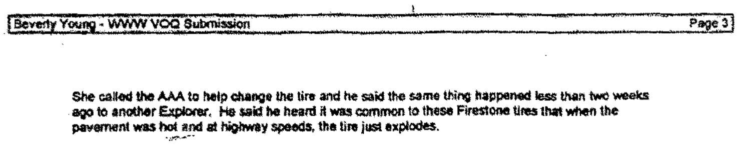
REPORTED TO POLICE: No

INFORMATION ON TIRE FAILURE(S) (IF APPLICABLE)

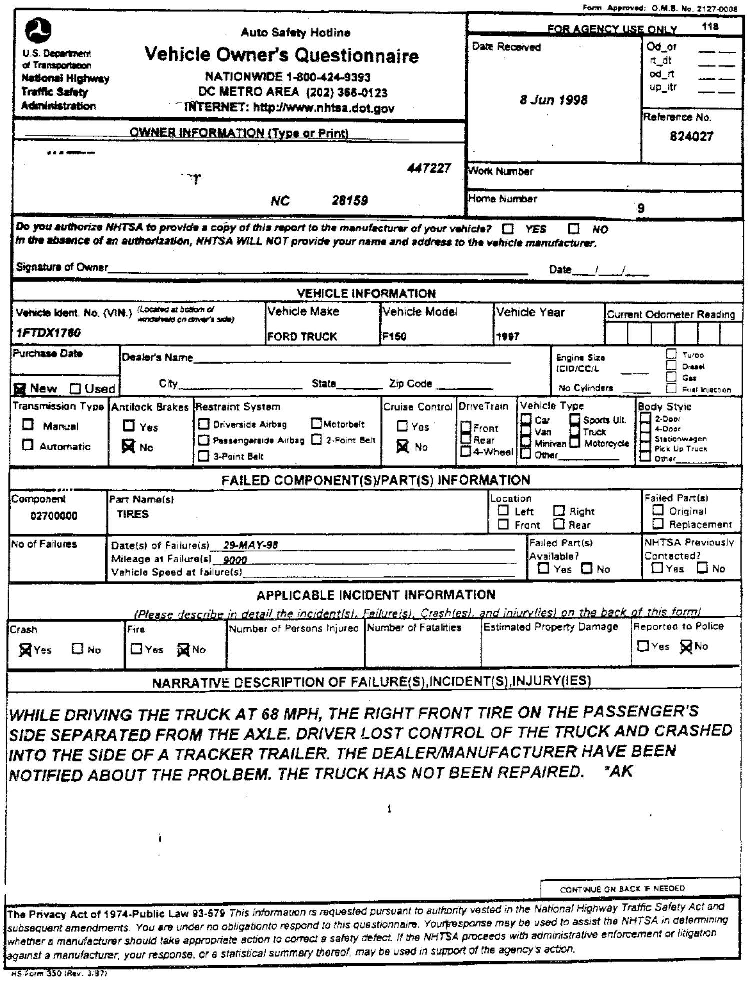
DOT NUMBER:
TIRE MANUFACTURER: Firestone
TIRE NAME: Wilderness AT
TIRE SIZE: p235/75R14

ADDITIONAL COMMENTS

My wife was driving on the way back from Texarkana, TX to Dallas on I-30. The the tread portion of the right front tire separated from the sidewall. Luckily she is a good drive and was barely able to keep the car under control. The separation was not jagged as expected, but the separation was symettrical on both of the sidewalls.



She called the AAA to help change the tire and he said the same thing happened less than two weeks ago to another Explorer. He said he heard it was common to these Firestone tires that when the pavement was hot and at highway speeds, the tire just explodes.



Form Approved: O.M.B. No. 2127-0008

U.S. Department of Transportation
National Highway Traffic Safety Administration

Auto Safety Hotline

Vehicle Owner's Questionnaire

NATIONWIDE 1-800-424-9393
DC METRO AREA (202) 366-0123
INTERNET: http://www.nhtsa.dot.gov

FOR AGENCY USE ONLY 118

Date Received: 8 Jun 1998

Od_or ___ ___
rt_dt ___ ___
od_rt ___ ___
up_itr ___ ___

Reference No. 824027

OWNER INFORMATION (Type or Print)

447227

NC 28159

Work Number

Home Number 9

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? ☐ *YES* ☐ *NO*
In the absence of an authorization, NHTSA WILL NOT provide your name and address to the vehicle manufacturer.

Signature of Owner________________ Date___/___/___

VEHICLE INFORMATION

Vehicle Ident. No. (VIN.) (Located at bottom of windshield on driver's side)	Vehicle Make	Vehicle Model	Vehicle Year	Current Odometer Reading
1FTDX1760	FORD TRUCK	F150	1997	

Purchase Date
☒ New ☐ Used

Dealer's Name________________
City________________ State________ Zip Code________

Engine Size (CID/CC/L) ____
No Cylinders ____
☐ Turbo
☐ Diesel
☐ Gas
☐ Fuel Injection

Transmission Type	Antilock Brakes	Restraint System	Cruise Control	DriveTrain	Vehicle Type	Body Style
☐ Manual ☐ Automatic	☐ Yes ☒ No	☐ Driverside Airbag ☐ Motorbelt ☐ Passengerside Airbag ☐ 2-Point Belt ☐ 3-Point Belt	☐ Yes ☒ No	☐ Front ☐ Rear ☐ 4-Wheel	☐ Car ☐ Sports Ult. ☐ Van ☐ Truck ☐ Minivan ☐ Motorcycle ☐ Other________	☐ 2-Door ☐ 4-Door ☐ Stationwagon ☐ Pick Up Truck ☐ Other________

FAILED COMPONENT(S)/PART(S) INFORMATION

Component	Part Name(s)	Location	Failed Part(s)
02700000	TIRES	☐ Left ☐ Right ☐ Front ☐ Rear	☐ Original ☐ Replacement

No of Failures	Date(s) of Failure(s) / Mileage / Speed	Failed Part(s) Available?	NHTSA Previously Contacted?
	Date(s) of Failure(s) 29-MAY-98 Mileage at Failure(s) 9000 Vehicle Speed at failure(s)________	☐ Yes ☐ No	☐ Yes ☐ No

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies) on the back of this form)

Crash	Fire	Number of Persons Injured	Number of Fatalities	Estimated Property Damage	Reported to Police
☒ Yes ☐ No	☐ Yes ☒ No				☐ Yes ☒ No

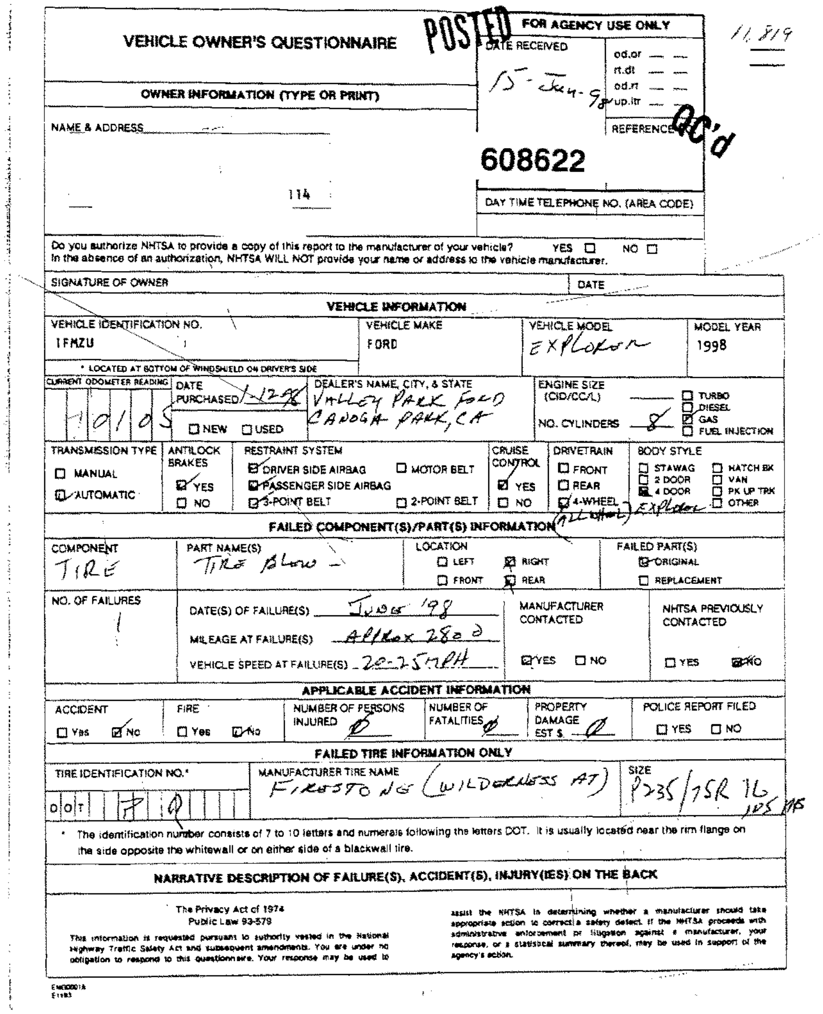
NARRATIVE DESCRIPTION OF FAILURE(S),INCIDENT(S),INJURY(IES)

*WHILE DRIVING THE TRUCK AT 68 MPH, THE RIGHT FRONT TIRE ON THE PASSENGER'S SIDE SEPARATED FROM THE AXLE. DRIVER LOST CONTROL OF THE TRUCK AND CRASHED INTO THE SIDE OF A TRACKER TRAILER. THE DEALER/MANUFACTURER HAVE BEEN NOTIFIED ABOUT THE PROLBEM. THE TRUCK HAS NOT BEEN REPAIRED. *AK*

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974-Public Law 93-579 *This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligationto respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.*

HS Form 350 (Rev. 3/87)



11,819

VEHICLE OWNER'S QUESTIONNAIRE

POSTED

FOR AGENCY USE ONLY

DATE RECEIVED 15-Jan-98

od.or
rt.dt
od.rt
up.ltr

REFERENCE

QC'd

608622

OWNER INFORMATION (TYPE OR PRINT)

NAME & ADDRESS

114

DAY TIME TELEPHONE NO. (AREA CODE)

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☐ NO ☐
In the absence of an authorization, NHTSA WILL NOT provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER

DATE

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO. 1FMZU * LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE	VEHICLE MAKE FORD	VEHICLE MODEL EXPLORER	MODEL YEAR 1998

CURRENT ODOMETER READING 10105	DATE PURCHASED 1-12-98 ☐ NEW ☐ USED	DEALER'S NAME, CITY, & STATE VALLEY PARK FORD CANOGA PARK, CA	ENGINE SIZE (CID/CC/L) NO. CYLINDERS 8 ☐ TURBO ☐ DIESEL ☑ GAS ☐ FUEL INJECTION

TRANSMISSION TYPE ☐ MANUAL ☑ AUTOMATIC	ANTILOCK BRAKES ☑ YES ☐ NO	RESTRAINT SYSTEM ☑ DRIVER SIDE AIRBAG ☑ PASSENGER SIDE AIRBAG ☑ 3-POINT BELT ☐ MOTOR BELT ☐ 2-POINT BELT	CRUISE CONTROL ☑ YES ☐ NO	DRIVETRAIN ☐ FRONT ☐ REAR ☑ 4-WHEEL (All wheel)	BODY STYLE ☐ STAWAG ☐ 2 DOOR ☒ 4 DOOR ☐ HATCH BK ☐ VAN ☐ PK UP TRK ☐ OTHER Explorer

FAILED COMPONENT(S)/PART(S) INFORMATION

COMPONENT TIRE	PART NAME(S) TIRE Blow -	LOCATION ☐ LEFT ☒ RIGHT ☐ FRONT ☒ REAR	FAILED PART(S) ☑ ORIGINAL ☐ REPLACEMENT

NO. OF FAILURES 1	DATE(S) OF FAILURE(S) June '98 MILEAGE AT FAILURE(S) Approx 2800 VEHICLE SPEED AT FAILURE(S) 20-25 MPH	MANUFACTURER CONTACTED ☑ YES ☐ NO	NHTSA PREVIOUSLY CONTACTED ☐ YES ☑ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT ☐ Yes ☑ No	FIRE ☐ Yes ☑ No	NUMBER OF PERSONS INJURED 0	NUMBER OF FATALITIES 0	PROPERTY DAMAGE EST $ 0	POLICE REPORT FILED ☐ YES ☐ NO

FAILED TIRE INFORMATION ONLY

TIRE IDENTIFICATION NO.* DOT 7 Q	MANUFACTURER TIRE NAME FIRESTONE (WILDERNESS AT)	SIZE P235/75R 16 105 MS

* The identification number consists of 7 to 10 letters and numerals following the letters DOT. It is usually located near the rim flange on the side opposite the whitewall or on either side of a blackwall tire.

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJURY(IES) ON THE BACK

The Privacy Act of 1974
Public Law 93-579

This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.

EM000001A
E1183

THE INSIDE OF THE TIRE BLEW
WAS TRAVELING ABOUT 20-25 MPH DUE TO TRAFFIC
ON A CITY STREET WHEN IT BLEW. NO DEBRIS
IN THE AREA - ALTHOUGH WHEN TAKEN TO
THE FIRESTONE DEALER HE SAID IT WAS
ROAD HAZARD WHICH I DOUBT WAS ABOUT A
4" RIP IN THE ~~SIDEWALL~~ INNER SIDEWALL. THE RIP
WAS JAGGED LIKE

Mr. DINGELL. Now, Dr. Bailey, if 25 complaints were enough for NHTSA to decide to open an initial investigation on March 6 this year, why weren't 26 complaints NHTSA received prior to July 1998 enough to justify NHTSA taking action then?

Ms. BAILEY. Each investigation is based on a variety of variables. In this case you mention the 25. It is my understanding that that 25 is a subset of the 46 that we had looked at over a period of 10 years.

Mr. DINGELL. So you've got 25, 26, but, in fact, you also got an additional 21 complaints from State Farm which were sent to you, which brings the total of complaints to 47. How could 47 complaints in July 1998 not be enough for NHTSA to—when NHTSA said that only 25 complaints were needed to open an initial evaluation in March of this year?

Ms. BAILEY. Because there are 50,000 complaints we receive in a year. There are approximately 500 complaints that we receive about tires. That's all tires. There are about 50 that related to Firestone and only about 5 per year that were relating specifically to these tires. So even combined with the 21 from State Farm, which was over a period of 6 years, in fact that would still not have been enough per year to instigate an investigation, and it did not do so.

Mr. DINGELL. Twenty-five, you said, were a sufficient number. And why is 25 sufficient and 26 or 21 is not, or a total of 47 not?

Ms. BAILEY. That is the addition. After the KHOU program in February of this year, the number we had that we had received over a decade doubled within a period of a couple of months. That was enough for us to begin the investigation on May 2.

Mr. DINGELL. Are you prepared to sit there and tell me that the number 25 was not a good warning that NHTSA should be looking at it, or that the additional 21 received from State Farm were not a good number? After all, we've now had a large number of people who have been injured, hurt, killed, and a large number of tire failures and vehicle accidents.

Ms. BAILEY. There are 240,000 rollovers a year and there are 10,000 people that die in rollovers in a year. There are certainly situations where tires fail. That's why we receive hundreds of complaints on a regular basis per year about tires. It is trying to determine when you need an investigation, putting it in perspective with all of that.

Mr. DINGELL. Now, NHTSA's cover letter to the copies of 26 complaints that were received before July 1998 is dated September 19, 2000. In that letter, Mr. Kenneth Weinstein, Associate NHTSA Administer for Safety Assurance, says these complaints were identified by the NHTSA staff in April of this year. Doesn't this mean that the NHTSA staff could not have been aware of these 26 complaints when the agency received the 21 complaints from State Farm in July 1998?

Ms. BAILEY. Well, we're still talking about numbers that are significantly lower than anybody's from other tire companies and concerns of failures about other tires. Let me explain what is going on, if that was the question, between March and May. We do an initial assessment; then we do a preliminary evaluation, which we began on May 2. But in the intervening time, there was a search of the Office of Defects Investigation's data base when we looked at all tire complaints. The searches were refined to identify tire, name, brand, and size and to identify the tire complaints that were associated with the Explorer vehicles. The hard copy of every Firestone tire failure complaint was pulled and read for additional detail. The majority of the complainants were called to ascertain the failure mode, whether it was tread separation or not, and to include the missing data of which there were extensive amounts, such as model, tire, tire size, mileage, vehicle model, et cetera.

NHTSA's Data Center was also requested to perform a FARS search on the Ford Explorers. There were a variety of activities going on. We also searched for court cases and attempted to get information from KHOU, which was not forthcoming until after we began the investigation; in fact, only in recent weeks.

Mr. DINGELL. Are you telling me that your ability to process information, your ability to procure information, was in this case deficient?

Ms. BAILEY. In this case I think what occurred between March 6 when we got the information and had to validate information from an investigative reporter source, and could not do so, we, as you know, had difficulty obtaining claims information and began to scour our own data bases. I think that action was appropriate for the time with the information that we were given.

But I will say that I think we need to do intensive analysis of our ability to integrate the data we do have.

Mr. DINGELL. It appears to have been highly deficient. I wonder if this is budget related.

Ms. BAILEY. That is clearly a budget issue for us and one that we are hoping that legislation will support. We are looking at over $1 million needed in order for us to update that data base.

Mr. DINGELL. I want to hear your recommendations as to what you need in the way of budget. And I would appreciate that that be submitted for the record, Mr. Chairman, and I hope that I will have unanimous consent to see that that is inserted in the record at the appropriate place.

Ms. BAILEY. Yes, sir.

[The following was received for the record:]

NHTSA has conducted a thorough assessment of the funds needed to carry out an effective Defects Investigation Program, and concluded that an additional $9 million is required in fiscal year 2001 to strengthen the program. The resources will be used in the following manner: provide enhanced testing at the Vehicle Research and Test Center and other facilities; modernize and enhance the Office of Defects Investigation's (ODI) database to incorporate analytical intelligence, integrate optical image retrievals and hardware; provide easy Internet access to ODI public files; enhance and improve procedures for tire testing; ensure adequate travel resources and staffing to improve the timeliness of ODI's processing of large amounts of information; and develop a media campaign (print, direct mail, and TV) to emphasize the importance of reporting complaint information.

Mr. DINGELL. Now, I understand that 20 of the 25 complaints NHTSA cited as a basis for its initial evaluation all came in in a 2-week period following a Houston television station's broadcast. Are we to assume that unless NHTSA receives an unusual number of complaints over a short period of time, such as occurred in the case following the Houston television report, we shouldn't expect NHTSA to open an initial or preliminary evaluation of the possible defects of tires or other motor vehicle equipment?

Ms. BAILEY. If we can validate that information. And that's why we need an overhaul of our ability to work with a system that, by the way, is over 10 years old.

Mr. DINGELL. Wouldn't you, and shouldn't we, expect NHTSA's staff today to open at least an initial evaluation if they were presented once again with 47 complaints of tread separation or blowouts involving a particular line of tires, as NHTSA staff received back in July 1998?

Ms. BAILEY. Those numbers were over a period of time. There was one fatality. And at the same time, we were receiving hundreds of complaints about other tire companies. So that alone would not have initiated a full investigation.

Mr. DINGELL. A lot of lives would have been saved if you had initiated that investigation. Doesn't that tell you you ought to have then reviewed the matter?

Ms. BAILEY. Could you repeat the question?

Mr. DINGELL. A lot of lives would have been saved had you commenced that kind of review in this matter in 1998, July.

Ms. BAILEY. Yes, sir, that's true. That's why we're seeking legislation so we can obtain information about the claims data we could not get, did not have the authority to receive, or the recall information from around the world. That would have definitely have given us the appropriate information so that we would have instigated an investigation sooner.

Mr. DINGELL. What changes are you going to make at NHTSA to make sure that it has both the ability and the requirement that it search its files to identify related complaints as happened in this case? I'm told computers can do that very well for you.

Ms. BAILEY. That's true.

Mr. DINGELL. But you do not have such mechanisms available to you at this time.

Ms. BAILEY. I could outline exactly what we intend to go through, sir, or provide it for the record.

Mr. DINGELL. I think that would be better provided for the record, because I think it is important, but I think it is something we don't have time for.

[The following was received for the record:]

NHTSA plans to undertake several activities to improve its ability to identify potential safety defects. Although our decisions regarding the specific actions to be taken will await the completion of our ongoing review of the Office of Defects Investigation (ODI) processes, as specified in section 15 of the TREAD Act, we can identify some general areas for improvement.

With some of the additional funds authorized by the TREAD Act and by the FY 2001 DOT Appropriations Act, ODI intends to substantially improve its data handling and retrieval abilities. The existing ODI database, which includes consumer complaints, service bulletin summaries, and investigation and recall information, was developed approximately ten years ago, with only minor enhancements since that time, and it does not reflect state-of-the-art technology. It was a relatively low-budget system, and, among other limitations, it does not contain complete images of the information submitted by consumers and other complainants. In order to review an actual complaint, the document has to be identified through a broad computer search, then individually retrieved. While the database has been a valuable resource in identifying potential safety problems, as the volume of information contained in it has increased exponentially, it has become increasingly more time-consuming to retrieve individual complaints to verify and supplement information about particular potential problems.

Our planned modernization will include the incorporation of analytical intelligence and will integrate the consumer complaint database with the optical image retrieval system, allowing expedited information search capabilities. Our overhaul will also afford the agency the opportunity to effectively incorporate the warranty, claims, and other relevant information that we will obtain from manufacturers of motor vehicles and motor vehicle equipment pursuant to the regulations to be adopted under section 3 of the TREAD Act. We also plan to explore possible ways of integrating the information in other NHTSA databases, which were originally developed for other purposes, into ODI's defect identification processes. We anticipate that these initiatives will allow the agency to be aware of potential safety problems earlier than under our current limited system.

Mr. DINGELL. Has NHTSA ever requested criminal penalties to be added to the Safety Act?

Ms. BAILEY. We have not up to this time.

Mr. DINGELL. Did the legislation NHTSA recently proposed include criminal penalties?

Ms. BAILEY. It is part of our multitiered approach to enforcement; yes, sir.

Mr. DINGELL. I'm sorry?

Ms. BAILEY. It is part of our approach for enforcement.

Mr. DINGELL. Was it in the legislation that you've submitted?

Ms. BAILEY. It is not in the legislation.

Mr. DINGELL. It is my recollection that both in 1966 and 1985 when the issue of criminal penalties came up, NHTSA was opposed. Is that your understanding?

Ms. BAILEY. That is my understanding, and I believe the thinking was that it impaired our ability to engage in a meaningful investigation given the possibility of criminal action.

Mr. DINGELL. I'm not quite sure I know what you're saying.

Ms. BAILEY. It is my understanding that the concern has always been that it may impair our ability to investigate. There is a certain amount of give-and-take required. If we are unable to obtain information because people are concerned about criminal investigations and penalties——

Mr. DINGELL. What you're saying is that a person who is then under investigation functions as if he's under a criminal investigation, it tends to inhibit cooperation with you because of that fact; is that what you're telling me?

Ms. BAILEY. I'm explaining what my understanding is of the determinations earlier on not to pursue that. I can tell you that the Secretary will be here today and can testify more to that, but I know that we now feel that that will allow us greater ability to function.

Mr. DINGELL. That it would impair your ability to function.

Ms. BAILEY. Yes.

Mr. DINGELL. Thank you very much.

Mr. TAUZIN. Before the gentleman completes, and I thank the gentleman, I want to point out for the record that in addition to the 26 consumer complaints the gentleman has cited that was available to you by 1998, there were the 21 instances reported by State Farm, and over the 18 months there were 45 additional cases reported, according to the State Farm testimony orally to the agency by phone call. And in addition, there was the FARS report indicating as many as, in 1999 alone, 43 fatalities added to the 15 in 1998. So that is in addition to all of the information that Mr. Dingell has pointed out was indeed available to the agency in 1998, in the months immediately post the July 1998 State Farm filing, for the record.

Ms. BAILEY. There is some duplication in those numbers, but you're exactly correct. We need better ability to integrate our data.

Mr. TAUZIN. The Chair recognizes the vice chairman of the O&I Committee, Mr. Burr, for a round of questions.

Mr. BURR. I thank the chairman and welcome our panel of witnesses. Mr. Lampe, either yourself or Mr. Saurer, let me just ask you this: Does Firestone have a defect in the recalled tires?

Mr. LAMPE. Sir, we believe yes, that there are, in a very limited numbers of those tires, a possible manufacturing defect.

Mr. BURR. Is Firestone currently looking at the potential of defects in any tires that are not currently under recall?

Mr. LAMPE. We continue, sir, to examine all of the tire lines and all the sizes, again using the data we've got. We are a data-driven company, using the claims data that we've recently used to identify this recall. Yes, sir, we continue to do that.

Mr. BURR. Does Firestone possess any information today that would indicate there is additional tread separation that's happening in the marketplace outside of the current group of recalled tires?

Mr. LAMPE. Sir, we've testified on a number of occasions that tread separations are not an abnormal effect, result, in the marketplace; not only our tires, anybody's tire. Dr. Bailey has testified a number of times that the best tire can fail for a number reasons, and one of the common failure modes is a tread separation.

Mr. BURR. Is there any tread separation that specifically resembles that tread separation that's being experienced under the recalled tires that Firestone sees on non-recalled tires today.

Mr. LAMPE. Based on the representation of the claims and adjustments, sir, we do not see any data that would indicate that we have any problem, or any problem with other tires, other than the ones we identified in the recall. We believe that the recall was overinclusive, if anything.

Mr. BURR. Ms. Bailey, correct me if I'm wrong. NHTSA has suggested a larger recall; am I correct?

Ms. BAILEY. Yes. On September 1 we, in fact, requested that the recall be widened.

Mr. BURR. It was widened for what reason?

Ms. BAILEY. It was indeed not widened at that time. So we did a consumer advisory so we could alert the American public to the danger, and subsequently the company has agreed that they will provide remuneration for those tires.

Mr. BURR. But they're not recalled.

Ms. BAILEY. They're not officially recalled.

Mr. BURR. So the company has agreed to replace those tires.

Ms. BAILEY. And I should say that we are monitoring and investigating as to whether or not there should indeed be a safety recall.

Mr. BURR. But they're not being recalled.

Ms. BAILEY. But they're not recalled at this time.

Mr. BURR. You would agree that if Firestone had recalled their tires in Saudi Arabia, that NHTSA might have been forced to react to a potential problem in the U.S. faster.

Ms. BAILEY. Absolutely.

Mr. BURR. And yet for this larger grouping of tires, we're not going to require a recall. We're going to allow a replacement process.

Ms. BAILEY. Not "allow." I would not use that word. In fact, as a regulatory body at this point, we are monitoring and investigating whether or not we should direct an investigation. At this point we are still in that initial assessment phase.

Mr. BURR. Tell me what specifically has changed at NHTSA since we began this investigation that would assure these members that, were State Farm or any insurer that regularly supplies information about potential trends that they feel are alarming, if they supplied 21 of those claims to NHTSA, what has changed at NHTSA today that would prevent those from falling through a crack and, as Mr. Dingell said, would bring to as high a prominence that trend that that claims adjustor saw as you getting 25 additional that all of sudden caused an investigation?

Ms. BAILEY. Initially we have realigned both personnel and resources so that we can conduct one of the, I think, fastest investigations we've ever done. This sometimes takes a year or 2 more. We're hoping to complete this in under 6 months. At the same time, I am not comfortable with the informal arrangement that we have had in the past with State Farm. We have asked, therefore, for legislative support—and you will be hearing more about that today—so that we can officially obtain claims data and that we can have a more official arrangement with not only State Farm but other insurance companies.

Mr. BURR. Reminding all members that you have not been in this position very long, and certainly were not there through much of the history that we're here to investigate, is it comfortable for every member to believe that if 21 claims from State Farm, with the severity of those 21 claims, that that would be something that NHTSA would investigate today?

Ms. BAILEY. It was analyzed at the time, and I've read the memo and researched that, but that is beside the point.

Mr. TAUZIN. May I interrupt a second? If Mr. Burr would yield a second.

Mr. BURR. We would be happy to.

Mr. TAUZIN. We went through this very carefully 2 weeks ago. The gentleman has testified to our investigators that, upon receipt of the State Farm information, he does not recall analyzing it, that the analyzing that was done was done just recently by your agency and a memo was prepared pursuant to that analysis. Is that correct?

Ms. BAILEY. That is correct, but he does not have recall of the particular exchange.

But I should correct the record that in our last testimony I had said also that I had seen the original memo that had come across, and that that was confused in that testimony with the reconstruction. And in fact I have seen the original memo and that——

Mr. TAUZIN. Let's——

Ms. BAILEY. [continuing] I agree with you that he does not recall——

Mr. TAUZIN. Wait a minute. Is there a memo that was prepared by the gentleman upon receipt of the State Farm? We have not received a copy of any such memo.

Ms. BAILEY. Yes.

Mr. TAUZIN. Is there such a memo?

Ms. BAILEY. There is a memo.

Mr. TAUZIN. May we have the memo?

Ms. BAILEY. Yes, sir. We will provide it.

Mr. TAUZIN. Where is it?

Ms. BAILEY. It is an e-mail, not a memo.

Mr. TAUZIN. There is an e-mail from State Farm to your office. Is there any document prepared by the gentleman who received the State Farm e-mail in your possession?

Ms. BAILEY. No, there was not one prepared——

Mr. TAUZIN. So there was no memo prepared by the gentleman then. There was no analysis that he can recall conducted then. All you have is a memo prepared after the analysis was done very recently, I think in August.

Ms. BAILEY. That is the reconstruction——

Mr. TAUZIN. That is a reconstruction?

Ms. BAILEY. [continuing] of what happened when that e-mail was received.

Mr. TAUZIN. Right. And as we have reconstructed what occurred when the e-mail was received, the gentleman has testified, to our investigators, that he does not recall ever analyzing that e-mail, and the State Farm representative who testified that he never heard from that gentleman by e-mail, by phone, by fax, by any means. Is that correct?

Ms. BAILEY. Yes.

Mr. TAUZIN. The Chair yields back to Mr. Burr.

Mr. BURR. I thank the Chair.

Ms. BAILEY. I would like to answer your question, though. I recall your concern that the 21 would not have instigated an investigation. Even if that 21 were recorded as it should have been and analyzed as it should have been at the time, even that over 6 years, being a few a year, it would not have initiated an investigation. But I can assure the committees that, in fact, if we had all the information we should have had at the time and that we are seeking legislation to now have the authority to obtain, we would have started an investigation much sooner. That is claims domestically, that is the information about the overseas recalls, it is the information from insurance companies that we should have a way to receive and the FARS data. All of that should have been integrated and should be integrated in the future with the legislation we are hoping to receive——

Mr. BURR. Dr. Bailey, hindsight is a wonderful tool to tell us what to do in the future. There is no substitute for a process where an individual can't disregard information that might be pertinent to a trend that clearly displayed the loss of human life. So I hope that you can, with a great degree of confidence, tell us that that can't happen in the future. That there is not only a process, there is a checks and balance system that exists on information and the evaluation of the information and the coordination of that with other data available in the market place.

Ms. BAILEY. I assure you of that.

Mr. BURR. Let me move on to Miss Petrauskas. Miss Petrauskas, unfortunately, Ford is currently in a new recall in Saudi Arabia pertaining to some Navigators, am I correct?

Ms. PETRAUSKAS. Continental has announced that they are going to do a recall.

Mr. BURR. Continental is going to do a recall on the Navigator.

Ms. PETRAUSKAS. Around the world, yes, sir.

Mr. BURR. Tell me when Ford was aware of a problem with that tire for the first time.

Ms. PETRAUSKAS. I think the first report we received was in April—I want to say April 1999 was the first time we got a report from the field of an issue with that particular tire.

Mr. BURR. Were you aware that there was a problem—potential problem with that tire, you personally?

Ms. PETRAUSKAS. At that time?

Mr. BURR. Yes, ma'am.

Ms. PETRAUSKAS. No, sir.

Mr. BURR. When did you become personally aware?

Ms. PETRAUSKAS. Actually, almost literally within the last week or so.

Mr. BURR. Within the last week or so.

Mr. Baughman, how about yourself?

Mr. BAUGHMAN. Actually, it is Baughman. But I first became aware of any issues on Continental tires on Navigator vehicles at the first hearing when a letter was produced saying that there was a report of a tread separation issue in the Saudi Arabia area.

Mr. BURR. I got to the hearing late, so I am not exactly sure of what the two of you are responsible for, but you just shared with me that in April 1998——

Ms. PETRAUSKAS. 1999.

Mr. BURR. —Ford became aware of a potential problem. What caused a year and some time to go by before the two of you learned that somebody at Ford was looking into a potential problem?

Ms. PETRAUSKAS. I have been cautioned not to talk for a long time, so I will make this real fast and compact. But in the April 1999 data I refer to is the first field report we got with respect to those tires. Over a period of time, we got a handful of additional reports. At the hearing, the committee brought up one of the reports we had gotten before. It turned out that particular tire had a puncture in it. I think this was a Saudi Arabian tire. When we got back to our offices after the hearing one of the things we learned is that the group that is supposed to monitor——

Mr. BURR. The CCRG group?

Ms. PETRAUSKAS. Yes, sir, the Critical Program Review Group actually——

Mr. BURR. Didn't they, in fact, meet in August?

Ms. PETRAUSKAS. I learned subsequently that they did when I got back from this hearing.

Mr. BURR. Share with me who in the hierarchy of Ford should know that the CCRG is currently looking at a potential tire problem. Because, in fact, I asked your chairman specifically in that hearing was he aware of any additional vehicles where tire problems existed, and he emphatically said he had no personal knowledge of that.

Ms. PETRAUSKAS. And I am sure that was the case. I mean, I work in that area, and I had no knowledge that the team was working on it.

Mr. BURR. I have gone through a time-intensive thing with Dr. Bailey, who wasn't even here then, trying to stress the fact that the chain of communication did not exist such that NHTSA could function in the role that they were there to do. I would ask——

Ms. PETRAUSKAS. But if I may, Congressman, it did function. And one of the—as it happens, the group that you refer to that met are Critical Concern—I always forget what the acronym stands for—Critical Problem Review Group. This is a technical group. They meet once a week, and the people who come to that meeting are engineering supervisors. And what they are asked to do is every week sweep up all the problems you have heard about, bring them to the meeting and we are going to talk about them. And so that is exactly what this group did.

Well, then, when they realized that we were having these meetings with individual tire companies to talk about how this early warning system might work, they brought it to us.

Mr. BURR. The chairman is about to pull the hook on me. Let me just make this statement for the record, Mr. Chairman.

In this particular case, we moved from the first organized review at Ford, the CCRG, of the potential Continental tire problem in late August of this year to this date, September 21; and we have already gone through a Continental recall, less than 3 weeks. And from this member's standpoint, I don't know if the speed with which you have gone through this is a response to the current interest that Congress has and the concern that the American people have or in fact whether the CCRG works that quick. And if it does it certainly broke down as it related to any involvement they might have had in the Firestone Explorer issue.

Mr. TAUZIN. The gentleman's time has expired. I will allow the gentlelady a quick response.

Ms. PETRAUSKAS. Just very quickly.

The one thing that I was struck by on the part of the Continental folks, I think within 48 hours they had all of the information—all this claims information, all warranty information, all the manufacturing data—so it was easy to make decisions because they came to us and shared all this information.

Mr. TAUZIN. I thank the gentlelady.

The Chair recognizes the gentleman from Ohio, Mr. Sawyer.

Mr. SAWYER. Than you very much, Mr. Chairman. Ten minutes sounded so long when we started, and it is sounding so short in its execution, particularly when we realize that this afternoon we are going to begin the process of marking up legislation that could have long-standing consequences in terms of the work that everyone at the table is doing.

Let me suggest that there are some concepts that are slowly coming to the surface. The first of these is that there is a complexity of cause when there is a tire failure. But the one that we seem to be most concerned about is the notion of when those tire failures are a product of a defect. Can you tell me, Dr. Bailey, what is a defect?

Ms. BAILEY. First of all, it takes us an average of 16 months to determine exactly that. And without spending a lot of time at it, we go through an initial assessment, a preliminary evaluation; and we are now in the Firestone case involved in the engineering analysis phase. There are many steps to take after that. We are going to, as this is our highest priority, speed this up and complete this in record time. But, generally speaking, it takes about 16 months to determine if there is a defect that is causing a vehicle or component to fail.

Mr. SAWYER. Can you tell me about the kind of help you are getting from the tire industry in trying to identify not only the specific cause in the circumstances that we have been talking about here, but, more broadly, what constitutes a defect and where standards ought to be set?

Ms. BAILEY. Firestone and Ford have been very forthcoming in responding to our information requests. I think where our communication has broken down and where we have none of us served the American public as we should have is in, again, our ability to exchange the data that would let us make the right decisions. In even the case of the Continental decision, that was all based on claims and warranty. We have no authority at this time to obtain that. I am hoping things will change, given the legislation we will be talking about later today.

Furthermore, it is not a recall with Continental. They are doing a customer satisfaction campaign. NHTSA and its good people are doing their work to make sure that we are now going to determine if that is sufficient or not, as we did this summer when, in fact, we tried to widen the recall with Firestone and could not achieve that quickly, so we did a consumer advisory. I think we are all moving much quicker but not as quickly as we can.

Mr. SAWYER. Let me ask you, can you describe briefly the level of cooperation that you need and receive from a tire industry in doing that sort of work?

Ms. BAILEY. When they suspect that they have a safety problem or they have claims or warranty issues that indicate there is a problem, they need to communicate with us sooner.

Mr. SAWYER. Let me ask you a follow-up on a question that Mr. Dingell asked earlier. I know we are not dealing with the Senate bill, but there is some suggestion in the Senate bill that, in fact, the distribution of a defective tire might in fact be a criminalized act. There are many different kinds of behavior that might be sanctioned as a product of legislation. I personally think that concealment of information that has been requested, or fraudulent reporting, could comfortably fall into anything that might receive a high sanction.

Ms. BAILEY. Perhaps and perhaps not. Because we have an existing criminal statute that already addresses falsification and concealment or cover-up. But that is with civil penalties. So we are at this point, as you know. The consideration is whether or not that is enough.

Mr. SAWYER. Well, and I understand that, and I fully appreciate the notion that criminal rather than civil concerns are involved there. But I become deeply concerned if, in fact, we are talking about criminalizing a product itself; and it causes great concern not only as applies to tires but virtually any of the components that might go into a complex product like an automobile. Can you comment on that?

Ms. BAILEY. I can comment by saying, in fact, if there is a willful violation of the law or intentional violations, then there is need perhaps—there is need for more vigorous enforcement.

Mr. SAWYER. Indeed, but if that violation is tied to the notion of what is a defective product and we are having difficulty deciding what is a defect, then it seems to me we are basing a severe sanction on a very uncertain base.

I won't take that any further. I hope that we can appreciate the problems involved when we deal with this.

One of the other things that we have seen slowly emerge is the complexity of the testing protocols that are part of the development and the use of a tire in the course of its life. We have talked about the 109 tests, the whole range of SAE tests, the different environments in which the tests are conducted, tire dynamometers and actual vehicles to which they will be applied as well as to mules which replicate the performance. Let me ask you quickly, is wheel base or track of a significant difference when using mules to test a tire? We have heard the wheel base made a big difference, and the track made a difference.

Mr. BAUGHMAN. Not in my engineering opinion. I don't think it is. The tires need to be tested at configurations such as if it is a rear wheel drive vehicle it needs to be a rear wheel drive vehicle. The suspension was a twin I-beam, which was used generically on all Ford truck products at that point in time. All of the axles were solid rear axles which were used generically on all Ford products at that period of time.

Mr. SAWYER. So the actual dimensions of the wheel base——

Mr. BAUGHMAN. The actual dimension of the wheel base might have been half a dozen inches longer, and the width of the vehicle might have been two or three inches wider, but the way in which the tire interfaced with the road, which is the purpose of the high-speed tests and why we run it at Arizona proving grounds on test track surfaces that are in excess of 120 degrees when the tire test is run——

Mr. SAWYER. Dr. Bailey, what are the dimensions of a tire's performance that ought to be the subject of testing that is reported to you?

Ms. BAILEY. What we are testing for is strength, endurance, durability under a variety of different conditions.

Mr. SAWYER. In establishing those tests, are you attempting to replicate every circumstance that a tire might be used in or are you attempting to draw base lines from which projections of performance can be made?

Ms. BAILEY. I think it is a base line standard but, again, in many ways does replicate much of the driving that would be done, at least in terms of temperatures and the pounds per square inch of inflation and the loading. Where I think it lets us down is in terms of the endurance, and I think we have all recognized that is one of the changes we would like to make and again are making in the winter of this year.

Mr. SAWYER. In the whole range of testing that goes on, is it fair to say that both automobile manufacturers and tire manufacturers do their own tests that go substantially beyond those that are required by 109?

Ms. BAILEY. Correct.

Mr. SAWYER. In doing those, do you have reporting requirements from those tests?

Ms. BAILEY. No, we do not.

Mr. SAWYER. Should you?

Ms. BAILEY. I think that is one of the things we could look at. I don't think we need the same type of authority to achieve that. I would hope that is something that we could do between the private and the public sector.

Mr. SAWYER. Let me ask you, as the only representatives we have here today of the tire industry and the automotive industry, is that the kind of reporting that you would find beneficial to you without imperiling trade secrets?

Mr. SAURER. If I understand your question, Congressman, you are asking reporting of our internal test development data.

Mr. SAWYER. Results of SAE testing and so forth.

Mr. SAURER. I don't personally think that would be appropriate. We are constantly changing tests, trying to invent new things. I think divulgence of that information gets involved with trade secrets. I would be concerned about that to some extent. We would like to cooperate, but I think we have to be careful there saying that any testing we did, because the testing protocols——

Mr. SAWYER. I don't want to discourage testing. I understand.

Mr. SAURER. The testing protocol itself is sometimes confidential.

Mr. LAMPE. But, Congressman, certainly on tests such as SAE that we do on normal production tires there is no reason that we wouldn't make that information available to the agency. If we are doing experimental testing or prototype testing, that is something else, but normal production testing, yes.

Mr. SAWYER. There is so much I want to ask, but let me come back to one final question I want to ask Dr. Bailey.

Mr. Dingell talked about your capacity to analyze data. I am really concerned that we may stipulate so much data that this turns into a data dump and that you have more than you can make use of. Can you give us some assurance, No. 1, that you have the capacity to perform the kind of sophisticated analysis that huge amount of data would require? And, if not, could you get back to us on what you will need, No. 1?

No. 2, the engineering capacity. We are talking about extraordinarily sophisticated products all across the automotive spectrum, and the engineering capacity within NHTSA simply to evaluate the meaning of data when it comes in once it has gotten to the point of being able to identify problem areas remains a concern of mine. Could you respond to us with regard to that?

Ms. BAILEY. Yes, sir.

First of all, we can, as you know, seek, as we do, outside testing through independent laboratories; and we do that. So I feel we can draw on what is best in America in terms of engineering expertise.

As far as the data base goes, it is 10 years old. I am reviewing now whether our Defect Information Management System (DIMS II), which is what we are operating under, really has what is required. We are already looking at DIMS III which is going to, I think, provide us the expertise and the integrative analytic capability to use our data more effectively. We need an upgrade of everything—our software, our hardware.

Mr. SAWYER. Personnel.

Ms. BAILEY. Everything that goes into analyzing the volume of data that we are getting and that we hope to get in the future.

Mr. SAWYER. Thank you very much, Mr. Chairman.

Mr. TAUZIN. The Chair thanks the gentleman; and the Chair recognizes the gentlelady, Ms. Cubin, for a round of questions.

Mrs. CUBIN. Thank you, Mr. Chairman.

I would like to being my question with Ms. Petrauskas. I would like to know, on my son's accident, the left rear tire is the one that lost the tread and blew out, so I want to know why on the—why that tire seems to have a higher rate of failure than the other tires do on the Ford Explorer. Is it possible that there is a design problem that makes the Explorer predisposed to having failure in the left rear tire?

Ms. PETRAUSKAS. The short answer to your question, Congresswoman, is we don't know. The interesting thing we found, though, is across the board in tread separation cases involving any kind of vehicle for whatever reason there has been a predominance of it occurring on the left side. Our engineers have spent a lot of time sort of brainstorming that idea or some of those brainstorming ideas, as has the press, I might add. But we do not really have a good explanation for that.

Mrs. CUBIN. Are you conducting any sort of tests on the Ford Explorer to see if that is a possibility, that the gas tank is on the left side, the drive shaft is——

Ms. PETRAUSKAS. Actually, part of the work that we are doing in terms of trying to determine what the root cause of the defect of the tire is involves testing of not just tires on Ford vehicles but those same tires on other vehicles to look at their performance. So our hope is once we understand the root cause of the tread separation then we will be able to answer a lot of questions.

Mrs. CUBIN. But it has to pique your curiosity at least that this is happening more on Ford Explorers than any other vehicle.

Ms. PETRAUSKAS. Well, fundamentally, 90 percent of these recalled tires that were produced went on Ford Explorers, so one of the—I mean, it happened to Ford Explorers. You know, the bad tires are on Ford Explorers. Ford Explorers have the bad tires. So that is the explanation there.

But, again——

Mrs. CUBIN. It is my understanding that the Ford Explorer body is built on the old Bronco II chassis, is that correct?

Ms. PETRAUSKAS. No, it is not.

Mrs. CUBIN. So was the chassis for the Ford Explorer designed specifically for the Ford Explorer?

Ms. PETRAUSKAS. Absolutely.

Mrs. CUBIN. Next, I would like to go to Mr. Lampe.

Talking about the testing of the tires, you talked about how severe the conditions are when you test 6 minutes at 112 miles an hour. I believe that is what you said, is that correct?

Mr. LAMPE. I don't believe I said that, the length of time. I think it is a 10-minute test at 112.

Mrs. CUBIN. How would that compare on stress to the tire with a trip that was 4 hours of driving at 75 to 80 miles an hour on an interstate?

Mr. LAMPE. Congresswoman Cubin, I can't answer that. I don't know how to compare the two.

Mrs. CUBIN. But, listen, you need to know how to compare the two. Because that is exactly what happens in real life, and 10 minutes at 112 in a cylinder isn't what happens in real life.

Mr. LAMPE. Yes, ma'am, I know. We need to do something different to get more closer to real life, and we have said that we will work with NHTSA, and we will do that.

The differences I wanted to point out to you is that the test we do inside is done inside. It is in a closed room. If you are going down the highway at 75 miles per hour, you have the wind and air coming toward you. That will cool your car down, cool your radiator down. When you are doing the test in the closed room, you don't have that effect. All I am saying is it is very hard to compare the high speed test, the SAE test, on an indoor drum, curved drum versus driving a car at 75 miles an hour.

Mrs. CUBIN. You know what? I don't care how hard it is to compare.

Mr. LAMPE. I know you don't.

Mrs. CUBIN. Another thing, in Wyoming—my husband is very type A personality. We rotate the tires on our cars every 4,999 miles, and we change the oil every 2,999 miles. He checks the air pressure on a very regular basis in the tires. And since I was a young girl I always knew that, with the extreme temperature changes in Wyoming, whenever there are—whenever new seasons come you make sure—because, as we know, air expands in heat, and it contracts in cold, and we have extreme conditions in Wyoming. Is there any kind of testing done on any Firestone tires, these or any, to account for or accommodate that difference in temperature in the real world?

Mr. SAURER. Let me answer that, Congresswoman. We do most of our testing in high heat, because it is heat which really destroys the tire over time. Of course, we do winter testing, but that is primarily for snow traction. We don't view cold weather as a durability issue like the heat.

Mr. TAUZIN. Would the gentlelady yield for a second?

Mrs. CUBIN. Yes, sir.

Mr. TAUZIN. Only to point out that in real life Arizona, western conditions, New Mexico conditions, we are told that, even though the ambient air temperature may be 101, 105, the surface temperature of the road on which Americans are really driving is about 125 or more. And the question is, you do the testing with ambient air temperatures up to 90 and 100 in your plant. Do you heat up the surface to 125 or more?

Mr. SAURER. Well, the drum itself will heat up from the tire heat.

Mr. TAUZIN. That is the point. The point is the drums are heating up, but in real life conditions Ms. Cubin is talking about in the States that she and others on this panel represent, the real life temperatures of the highway can exceed 125 degrees; and my understanding is that is not replicated in the in-plant test and could make some significant difference.

I only point that out, Ms. Cubin, because, as we move toward regulation, we need to take those into account.

Mr. SAURER. Mr. Chairman, I would quickly add that that is one of the reasons that we have the outdoor proving grounds in the Southwest of this country where we are seeing those kind of temperatures. And we run some, as I said earlier, 40 million miles of testing on very heavy loaded—actually, on this size tire on loads that an Explorer can't see, around a track on high heat. We have those kind of tests. Those tests are designed to produce failures in tires so that we can understand the high stresses they are undergoing and so we can make changes to improve them on a continuous, evolutionary——

Mrs. CUBIN. Thank you, Mr. Chairman.

I realize that the greatest amount of wear will take place in high temperature conditions. However, when you get to 40 below, which it gets in Wyoming sometimes, that has an effect on rubber. Rubber tends to crack, which makes a tire much unsafer to drive on. Are any tests done in that regard?

Mr. SAURER. We——

Mrs. CUBIN. Just yes or no.

Mr. SAURER. Yes, there is chemistry work that is done. I am not a chemist.

Mrs. CUBIN. No, no, no. I am a chemist. I am talking about are there any tests in the laboratory or on the highway that are done at temperatures like 40 below zero on those tires? On the tires, not on the rubber.

Mr. SAURER. On the current tires today, we do not do that. We used to do that on fiberglass belted tires called cold box testing, because fiberglass was subject to being brittle when cold. But we don't see that as an issue on today's radial tires.

Mr. LAMPE. But it is something we need to look at, Congresswoman Cubin.

Mrs. CUBIN. Thank you very much.

While I am at it, I would like to go back to Ms Petrauskas. Are you now or will you be studying the engineering of Ford Explorers to see if there is a reason that the left rear tire seems to be the one with the biggest problem on Ford Explorers?

Ms. PETRAUSKAS. Again, as I indicated earlier, that is something that seems to be true for all vehicles.

Mrs. CUBIN. I really do not care. I am asking yes or no, please.

Ms. PETRAUSKAS. We will certainly do that as part of the root cause work we are doing on the tires.

Mrs. CUBIN. If you want to sell Ford Explorers ever again—and, frankly, I would just park mine along the side of the road and not even mess with it anymore—in today's environment I should think you would want to change today's environment and get the American public some reassurance that it is a safe vehicle and that they don't have to worry about their families.

Ms. PETRAUSKAS. Congresswoman, absolutely. We recognize that is something we have to do every single day. What gives us courage in all this is we know that in the real world that Explorer has been one of the safest SUVs we have.

Mrs. CUBIN. Well, I don't necessarily know if that is because the Explorer's design is excellent. I would think you have to look at the demographics of people who drive Ford Explorers. It is soccer moms. They drive slower. They don't have the kind of wear and tear and I am going to use the word "reckless" drivers, if you will, that other vehicles might have.

Ms. PETRAUSKAS. There is no question that demographics plays a role in all of these. When we make the comparison we make the comparison to light vehicles. In the comparison group is the Mercedes M class. So what we try to do is that—make sure they are fair comparisons. And in that context the vehicle has really been a star in terms of safety. But I agree 100 percent with what you said. That is something that we have to earn every single day.

Mrs. CUBIN. This is a quick question of Mr. Lampe. Is the 30 PSI level a new standard now? Is that new from the 26?

Mr. LAMPE. The 30 PSI that we have recommended?

Mrs. CUBIN. That is correct. Is that a new standard?

Mr. LAMPE. No, I can't say it is a standard. It is what we recommend people put in their tires.

Mrs. CUBIN. So you have stopped recommending the 26.

Mr. LAMPE. We are recommending 30 PSI in the Explorer and the Mountaineer, yes, ma'am.

Mrs. CUBIN. How can you be sure that is safe? Is it just in experience of what is happening on the highways?

Mr. LAMPE. No, we worked with Ford on this. Again, as I said in the opening remarks, we are very concerned about doing something with the tire that would change the overall interaction of the vehicle and the overall performance of the vehicle. The manufacturer has got to make sure that whatever we do works well with everything else in the vehicle. Ford did look at and approve a range from 26 to 30 PSI on the Explorer and the Mountaineer. We are only saying we recommend—from the tire standpoint we recommended the high of the range, the 30 PSI.

Mr. TAUZIN. The gentlelady's time has expired.

Mrs. CUBIN. Could I ask one more question?

Mr. TAUZIN. Yes, ma'am.

Mrs. CUBIN. Regardless of the reasons, it is very troublesome to me that these tires were recalled in the Middle East and recalled in South America and yet nothing was done either by NHTSA or by Firestone to even see if there was a problem in the United States. That is very troublesome to me. It is my understanding that there are two dozen other tire sizes and models that have similar or greater claims rates, according to Firestone data. I realize it is a smaller number and not adequate for reasonable scientific conclusions. Are those going to be recalled?

Mr. LAMPE. Congresswoman, we're still working with NHTSA and some of that's our fault. We had a meeting with them last Friday that we had to cancel, and there was one this week. We'll continue to work with NHTSA on that. We wanted, it was mentioned earlier, we wanted to take the consumer out of the middle of this completely and we did announce to the consumer and to the public that if a person had these tires on their car, came into one of our locations, that we would replace these tires at no charge. And if we don't have a replacement tire—many of these tires haven't been produced for 5 or 6 years—if we don't have a replacement tire we'll establish a reimbursement program for the consumers.

Mr. TAUZIN. And those tires are identified on your Web site?

Mr. LAMPE. I don't want to tell the chairman something that I'm not sure of. I don't know if they are or not.

Mr. TAUZIN. Let us make a request that you will do so. If you're going to tell the American public to get these replaced, then at least identify them on your Web site so that folks can know which tires we're talking about.

Mr. LAMPE. We certainly will do that.

Mrs. CUBIN. Dr. Bailey, I have questions that I will be submitting to you that time doesn't permit me to ask.

Mr. TAUZIN. The Chair recognize the gentleman from Minnesota Mr. Luther for a round of questions.

Mr. LUTHER. Thank you, Mr. Chairman. First of all, just a couple kind of administrative questions. Both Firestone and Ford have submitted documents to us now, and as I understand it, there are 25 lawsuits against Ford and I believe 52 against Firestone, is that correct, as of now?

Mr. LAMPE. Congressman, I believe that number was accurate as of the end of May when we made our initial submission to NHTSA. That number is undoubtedly probably higher now.

Mr. LUTHER. And Ford.

Ms. PETRAUSKAS. I'm confirming the number right now, momentarily. Again as of the time we have made this submission to NHTSA, the number you said, Congressman, is correct. It's 25. There has been lawsuits filed subsequent to then.

Mr. LUTHER. Are you both going to be providing us, then, with the documents on the lawsuits that have occurred since then?

Ms. PETRAUSKAS. We can do that.

Mr. LUTHER. And Firestone.

Mr. LAMPE. Yes, sir.

Mr. LUTHER. Has it already included all of the documents in the lawsuit, and will it include all the documents? And by that, I mean the pleadings, summons and complaint, and the expert opinions and the internal memos.

Mr. LAMPE. We can provide those and I believe we have. There was much discussion about confidentiality on these court cases and stuff, and I believe we pointed out in prior testimony that the only thing that's ever been confidential about these lawsuits was the settlement, and that was agreed upon by both parties; and trade secret information that was issued; a court order was issued by the judge and the judge ruled. But we have even committed to make that information available.

Mr. TAUZIN. Would the gentleman yield briefly?

Mr. LUTHER. Yes.

Mr. TAUZIN. The investigators for both sides are working on protocols with reference to obtaining some of those internal informations, at the same time respecting confidentiality.

Mr. LUTHER. Thank you, Mr. Chairman. And for Ford would the response be the same, then?

Ms. PETRAUSKAS. We have made available to the committee information, I should say documents from litigation; and, you know, we've indicated that we're going to cooperate in any way we can.

Mr. LUTHER. The point that I'm making is that if you are not disclosing any particular document, you will advise us of that document or the portion of that document so that we will be aware that it exists; is that as I understand it?

Ms. PETRAUSKAS. I believe that's what we've been doing right along.

Mr. LUTHER. Is that true for Firestone also?

Mr. LAMPE. Yes.

Mr. LUTHER. Are there insurance companies involved in any of these cases?

Mr. TAUZIN. Could I interrupt again for a second? Our understanding is that Ford has not yet produced a list of documents that are being withheld so far, as we're working out these protocols. It might be helpful for you to do so.

Ms. PETRAUSKAS. My understanding is that there are folks talking to the staff about this. I'm sorry, I haven't been involved in it.

Mr. TAUZIN. Thank you.

Mr. Luther.

Mr. LUTHER. Are there insurance companies involved as well from Firestone's standpoint and from Ford's? Do you have insurance carriers on any of these claims?

Mr. LAMPE. Not from a first dollar standpoint we don't.

Mr. LUTHER. Are there some carriers involved that would have been involved in any of this litigation?

Mr. LAMPE. There is excess insurance on our part, and I'm sure there would have been some of the carriers involved from the plaintiff's side.

Mr. LUTHER. Is that true of Ford as well?

Ms. PETRAUSKAS. I believe so.

Mr. LUTHER. Would you be willing to instruct those companies, then, to provide us documents as well?

Ms. PETRAUSKAS. I'm sorry?

Mr. LUTHER. Would both of you be willing to instruct those companies to provide us with the documents?

Ms. PETRAUSKAS. I'm sorry; the documents, meaning?

Mr. LUTHER. Related to——

Ms. PETRAUSKAS. Litigation materials?

Mr. LUTHER. That's right.

Ms. PETRAUSKAS. I don't know of any reason why we wouldn't. We've provided everything else to the committee.

Mr. LUTHER. Would that be true of Firestone?

Mr. LAMPE. We'll work with the committee on that also.

Mr. LUTHER. In your companies, then, do you also have internal memos between management and either in-house counsel or outside counsel or your insurance companies relating to these claims? There would be memos?

Ms. PETRAUSKAS. I would assume that there are attorney-client communications going on all the time.

Mr. LUTHER. Are you willing to provide that documentation to the committee?

Ms. PETRAUSKAS. My understanding is that we're working with the staff of the committee to try to figure out how we give the information that you all want to see without waiving attorney-client privilege. And I understand those efforts are underway.

Mr. LUTHER. And as I understand, you're agreeable to doing that, then; to providing those memos?

Ms. PETRAUSKAS. Again I will tell you what I know about it Congressman, and that is we're working with the staff to try to find a way to give you the information you want, but at the same time still retain an attorney-client privilege. And people are working on that.

Mr. LUTHER. So basically now you are standing by the attorney-client privilege on those kinds of documents.

Ms. PETRAUSKAS. What we would like to do is we want to find a way to give the committee the information it wants without waiving something as basic as attorney-client privilege.

Mr. TAUZIN. Would the gentleman yield again? Only to point out, so I can understand what's going on here, that in the courtrooms of America there is such a thing as attorney-client privilege. That does not apply to an investigative committee of Congress. Congress has the right to demand production of these documents if we so choose, and we reserve the right to do, of course. The problem is how to do it in a protocol that respects the trade secrets and other sensitive matters that are not relevant to our investigation. And our staffs are trying to work that out, but so far it has not yet worked out. I want that on the record. I thank the gentleman.

Mr. LUTHER. Thank you, Mr. Chairman. I will proceed on. Then I take it there are expert opinions that have been rendered regarding the cause of this problem with these tires, and you have reviewed those?

Ms. PETRAUSKAS. I don't know of the expert opinions in any sort of final sense with regard to the issue with these particular tires and, as I think we've indicated to the committee, there's lots of people working on trying to identify the root cause. If you're back to the litigation question, I believe we made all of these expert studies available.

Mr. TAUZIN. Would the gentleman yield once again?

Mr. LUTHER. Sure.

Mr. TAUZIN. I think for the record again, we need to point out that we have a good example of how attorney-client privilege was asserted initially and then properly withdrawn, and that has to do with the Middle East memo in Saudi Arabia. Ford initially provided us with a document which gave the first-page information with reference to Firestone's concerns, but redacted the second page under attorney-client privilege. They later, upon our request, provided us with the second page, which then provided the information that Ford had concerns, quote, similar to Firestone's. Had we not insisted on Ford providing us that in spite of the attorney-client privilege, we would not have known that. That's why it's important that we indeed process this protocol as rapidly as possible.

Mr. LUTHER. Thank you, Mr. Chairman. And then I'll wait for the outcome, then, of your work. I take it, then, there have been—you're both aware of some opinions that have been rendered as of this date on what the problem is with these tires. If Firestone could respond? You have seen some opinions that have been offered by experts.

Mr. LAMPE. I believe, sir, that we have provided all of that information to the committee. We have one outside independent investigator who just started a couple days ago and obviously has not rendered an opinion. That information will be made available to the committee.

Mr. LUTHER. I'm talking about outside parties and that would be directed at both of you. There have been outside parties that have rendered opinions as to a defect in these tires.

Mr. LAMPE. You say outside third parties in litigation?

Mr. LUTHER. Right.

Mr. LAMPE. That has been provided is my understanding.

Mr. LUTHER. And you have provided all of that to the committee?

Mr. LAMPE. That's my understanding.

Mr. LUTHER. Thank you, I appreciate that. And settlement amounts, is that something you are keeping confidential?

Mr. LAMPE. Settlement amounts in the past have been confidential. We have agreed already to supply that to the committee, and the only cases I must "quotation mark" that for is when we have a plaintiff that has agreed to a settled amount, we must get his permission. We feel we must get his permission to release that, but we will provide that to you.

Mr. LUTHER. The reason I asked the questions and the reason I focused on the claims is there has been a lot of talk about how these tires were manufactured, and we can all find fault in that and the tests. But I think equally as important is how the company handled this matter when you were put on notice by various means of what was going on.

Now, as I understand it, you were admitting today that there is a defect in these tires? When you testified earlier you used the word "possible" defect. Is there a defect?

Mr. LAMPE. We believe there is a defect in a very small percentage of these tires, sir.

Mr. LUTHER. What is it within the corporate culture here—and organizations have cultures as well as corporations—but what was it within the corporate culture here that did not allow this information to permeate the management?

Mr. LAMPE. Sir, in the case of the tires, as we've talked earlier, the proven methods that we used up till now to determine whether we had a safety issue problem, all those methods were fine. We did not see anything. It was when we went to looking at data that we had never used before to look at a safety issue that the overrepresentation of a certain type of tire on a certain vehicle and a certain manufacturer at a certain plant came up. We obviously will change the way we looked at our data. We must.

Mr. LUTHER. The interesting thing about your testimony today is that when we were talking about test failures, you were making the point that some of those test failures were not particularly significant because there weren't tire failures. So in other words, when the chairman was here and was doing a very good job of questioning you about the 10 percent failure rate or whatever, why wouldn't that put you on notice, you testified that that wasn't particularly important because you didn't view it as a safety issue. It wasn't important because there weren't tires failing. Then when tires start failing, what do you do? The information gets sent to the accounting department.

So you had it both ways. On the one hand, you don't pay attention to the test, and then when the information comes in, you don't pay attention to the information on failures. Now, what created that kind of an environment or a culture where that would occur?

Mr. LAMPE. Sir, I didn't mean to give the impression that we do not pay attention to the test.

Mr. LUTHER. No, but the point you made is that it wasn't particularly significant. You made that point a number of times because tire failures would be significant. These were very strenuous tests was the point that you were making. So 10 percent, why be concerned about 10 percent failure on strenuous tests when there aren't tire failures? That's the point you were making.

Now, when we look at the tire failures and the mounting information coming in, it gets sent to the accounting department. Tell us about the inside of the company and how it could handle things this way when you're talking about the safety of Americans.

Mr. TAUZIN. The gentleman's time has expired but I'm desperate to hear your answer to that, sir.

Mr. LAMPE. Thank you, Mr. Chairman. We obviously in light of what's happened, we've relooked at the way we've normally looked at claims data and early warning indicators. We are very very supportive of improving the early warning system as well with NHTSA and through the governmental agencies.

My point on the tests, sir, were these are high speed tests. They are to qualify tires for high speed operations. We don't take them lightly. If we have a failure in the test, we don't stop. We retest multiple tires to make sure that the tire construction qualification is suitable and we will pass the test. I'm sorry if I gave the impression that it is incidental to us. It's certainly not.

Mr. TAUZIN. There were tire failures in the test.

Mr. LAMPE. Yes, sir, there were.

Mr. TAUZIN. I thank the gentleman. The Chair recognizes the gentlelady from New Mexico, Mrs. Wilson.

Mrs. WILSON. Thank you, Mr. Chairman. In the first hearing we had, I asked Firestone about its prioritization of States for the recall and the reason that New Mexico was not in that prioritization. Has Firestone changed its distribution pattern at all as a result of any kind of internal discussions following the last hearing?

Mr. LAMPE. Congresswoman Wilson, I don't know what was communicated completely at the last hearing, but let me give you—try to summarize what we've done. When we first announced the recall, we announced it as a phased program. Believe me, that was never intended to not replace tires in every State. We started from day one——

Mrs. WILSON. Mr. Lampe, I am well aware of that and that you abandoned that silly idea early on. The reality is that you are still short of supply and that you have since corresponded with the New Mexico Attorney General that you were prioritizing your supply based on the number of accidents per State. Your executives admitted that you weren't looking at the number of accidents per capita or even the number of accidents per vehicle. And I just want to know if, after our hearing 2 weeks ago, Firestone has done anything.

Mr. LAMPE. Congresswoman, I know that you talked about the per capita and I believe we are, I believe we are looking at that on a registered vehicle basis by the State. I cannot tell you today if we have changed our distribution process based on that per capita evaluation. I'm sorry. I don't know the answer.

Mrs. WILSON. The fact that you do not know the answer tells me that you probably haven't done anything. Is that a fair assumption?

Mr. LAMPE. No, ma'am, I don't think that is a fair assumption.

Mrs. WILSON. Is there anyone from Firestone here who knows whether you took back to your headquarters the information that we discovered in our last hearing and did anything?

Mr. LAMPE. Mrs. Wilson, I promise you that I will get you that answer immediately.

Mrs. WILSON. Will everyone in the room representing Firestone please raise your hands?

Is there anyone here from Firestone that brought that information back and did anything with it ?

Mr. LAMPE. Ma'am, if your question is were your concerns communicated, yes, they certainly were.

Mrs. WILSON. I'm not asking whether you're communicating; I'm asking whether you're acting.

Mr. LAMPE. I don't know the answer to that but I will get the Congresswoman the answer.

Mrs. WILSON. Thank you.

I wanted to thank Ford Motor Company because they did act. Last week they shipped 6,000 tires from one of your competitors to the State of New Mexico. I wanted to thank Ford Motor Company for being responsive and concerned about consumer safety. I am very disappointed in your answer, sir.

I have some other questions. In the information that we've been provided here on testing in 1996, Decatur tires from the Decatur plant failed to meet that 10-minute test that we've been talking about at 112 miles an hour. And then in March 1998, there was a design change that, according to the documents we've received, was intended to help prevent separations with a wedge. Firestone has said this is not in response to knowledge of any problem. What knowledge or engineering science was it based on?

Mr. SAURER. Let me answer that, if I may, Congresswoman. The wedge change is part of a continuous improvement program that we do every day. If you make a change in a product and assume that what you had was bad and now you're making it good, what a shame it would be. Every product in this country goes through evolutionary and improvement changes, just like cars, or whatever.

We made that change in March 1998 for over 100 lines of tires involving 17 sizes in large P-metric tires when we realized that this market was growing and growing. We're talking about programs we're working on now for 2003 and beyond. A large P-metric tire going on really what is called light trucks and SUV's. We made that change because while our adjustment rates have been at historical lows for belt separation, this was a feature that we had started to use in our light truck tires and we knew we would be directionally right. This feature is actually in the recalled Decatur tires from 1998 on. It had nothing to do with the P235 and the recall situation. It's part of our ongoing philosophy. Just like our——

Mrs. WILSON. I——

Mr. SAURER. Excuse me if I may. Just like our founder said, Mr. Firestone, many years ago, "Best today and still better today." And I hope that this committee understands and appreciates that we will continue to make change in our product as we find new technologies to make them better. If we're going to be afraid to make change in our product because someone is going to accuse you of that which preceded it was bad, then shame on us.

Mrs. WILSON. I wish you would answer my question because I wasn't accusing you of anything, sir. I asked you what engineering science told you that this would be an improvement.

Mr. SAURER. This was an application, as I just said, on light truck tires, and in addition we do some FEA analysis. This was based on FEA analysis, trying to reduce belt edge sheer strain between the belts.

Mr. LAMPE. Mrs. Wilson, we had a belt wedge in the tires. What we did was increase it, the change, and we increased it because we felt it would give a better resistance to separations.

Mrs. WILSON. And did you have testing data that would show you that this would yield an improvement in performance?

Mr. SAURER. Our testing, as I said, was based on what we had previously developed in light truck tires, and since these P-metric tires are being used in the truck, we applied it in that manner. In addition, our scientists and engineers working on FEA modeling also determined through modeling that this is a reduction in sheer strain which is a common practice in laminate structures.

Mrs. WILSON. How do you decide what your quality tests will be?

Mr. SAURER. Are you referring to in the plant or overall?

Mrs. WILSON. I'm specifically referring to this question of what does the government require.

Mr. SAURER. I think——

Mrs. WILSON. Excuse me. If you could, I am specifically referring to the question of what the government requires as opposed to what you as a company think is adequate to ensure the quality of your product. How do you decide what quality tests you use?

Mr. SAURER. We do three basic things. We do a lot of laboratory and internal development testing. We test on outdoor facilities. We watch our adjustment rates and we also bring tires back from the field as a return for warranty adjustments and analyze them. The tests have been developed over years and years of experience. We run a large battery of tests and determine those types of tests which produce failures, products that we replace. We constantly try to move forward in a positive way.

Mrs. WILSON. I'm not asking what the tests are. I'm asking you, how do you develop, how do you decide what you should do for tests, because you described a series of tests, 10 minutes at 112 miles an hour. Your colleague differs as to what the government requires. I want to know how internally you go about deciding what should your standard be for consumer safety.

Mr. LAMPE. Mrs. Wilson, we obviously comply with all the required tests, the governmental tests.

Mrs. WILSON. Is that your only standard?

Mr. LAMPE. No, ma'am.

Mrs. WILSON. All right.

Mr. LAMPE. We also self-impose other tests, recognized structured tests like the SAE. That is not a required government test, but we adopted it. And we've developed many more tests in our proving grounds, in our laboratories and so forth, based upon just evolution in our experience of what we need to be looking at. We do much more beyond what is required.

Mrs. WILSON. My point is—and this will probably be my last line of questioning—there has been lot of discussion here about what those tests are and whether those—if they are appropriate in real world conditions or how the product is going to be used. It seems to me there are scant tests at the recommended tire pressure for the company that produces the vehicle. At the same time, you are testing at 10 minutes at 112 miles an hour. Why is that the standard? And the question not of what the test is, but how you develop what your test should be in any company focused on quality is critical, and it sounds to me as though there are gaps here and you need to go back to some fundamentals of how do we decide as a company what our quality test should be. I yield the balance of my time, Mr. Chairman.

Mr. TAUZIN. I thank the gentlelady. Let me tell you where we are: Mr. Rush will be next. Mr. Upton is returning from the vote and will take over. We will try to wrap up the round of questions with this panel.

Secretary Slater is available and wishes to give us a report from the Department of Transportation which we want to receive. We'll simply take his testimony and then we'll adjourn and move to begin our markup process.

So, Mr. Rush is recognized at this time. Mr. Upton will be back in just a minute. Mr. Rush.

Mr. RUSH. Thank you, Mr. Chairman. Dr. Bailey, I would like to get back to the question as to how many complaints it takes for NHTSA to open a formal investigation. In earlier testimony, you told Mr. Dingell that 26 complaints that NHTSA had in 1998 was not enough; is that correct?

Ms. BAILEY. The 26 he commented on I believe is a subset of the 46 we had which occurred over almost a decade.

Mr. RUSH. And you said that was not enough.

Ms. BAILEY. That would not be enough because it would be several a year, while we received hundreds of complaints from other tire companies about other tires.

Mr. RUSH. I have before me a NHTSA report which shows your agency opening an investigation on Michelin tires in 1994 with only five complaints. Can you explain that?

Ms. BAILEY. Yes, sir. That was a request from the Office of the Attorney General of the State of Kentucky, and that therefore was an unusual circumstance. Often if we're petitioned by a State official, we may instigate an investigation, and we did so in that case. The investigation, by the way, was closed and there was no recall.

Mr. RUSH. And so there are instances where NHTSA will open up an informal investigation without an extraordinary amount of complaints, number of complaints; is that right?

Ms. BAILEY. We look at all the variables, yes. We look at a number of complaints, but in this case it was also the fact that the Office of the Attorney General was involved. I should also say that, again, tires do fail, but we can sometimes open an investigation with only one or two complaints if it's a component of a car that should never fail, like a seatbelt or a child seat.

Mr. RUSH. Can you explain to me if you look at the chart, where would you have started an investigation on that chart?

Ms. BAILEY. I don't understand what you're asking about that particular bar graph. I can tell you about what it is that we use to determine, but you'll have to rephrase the question for me.

Mr. RUSH. Those are complaints there, right?

Ms. BAILEY. Right.

Mr. RUSH. Where would——

Ms. BAILEY. No, those are fatalities related to tire failure, and I'm trying to determine where that is——

Mr. TAUZIN. It comes from police——

Ms. BAILEY. That's FARS data?

Mr. TAUZIN. This is FARS data.

Ms. PETRAUSKAS. In the few times the tire box is checked.

Ms. BAILEY. Thank you.

Mr. RUSH. Where would you start initiating a NHTSA investigation based on the chart there?

Ms. BAILEY. Well, first of all, the FARS data is used separately. It is used for a variety of reasons, not necessarily applied the way that I think we all know now we should be applying it. So if you look there at that data, the data come in from law enforcement agencies around the country. It is incomplete data. Sometimes it will say it was tire failure. It will not have a vehicle. We don't have a VIN number. We can't validate the numbers. So it is not data that is used in the same way as the complaint data base, but it is one of the things that I am committed to reviewing so that we can begin to apply that data base more effectively.

Mr. RUSH. Can you explain the action of your agency as it relates to the ATX recall? I understand that you have that, you have—first of all, did you have enough information with only one failure—there were 24 brands, 1.4 million failures, that affected 24 brands; is that right?

Ms. BAILEY. I would have to check that number. You mean in the total recall of August 9?

Mr. RUSH. In the advisory that you put out.

Ms. BAILEY. In the advisory, there is 1.4 million in that advisory that we put out on September 1.

Mr. RUSH. And I understand what you included in that advisory was the ATX brand; is that right?

Ms. BAILEY. There were several brands included in that advisory. In fact, it had a long list which included a lot of Firestone ATX, yes.

Mr. RUSH. Were there any instances where there was one failure that you included on that advisory?

Ms. BAILEY. If you're referring to the fact that sometimes there was a low tread separation or failure rate, you have to also look at the production number, if there was a production number that was very low. But if they only produced, say, three of them, and one of them failed, yes, that would probably be a concern. But you need to know that in that list of information, there were sometimes production numbers of 200,000, 100,000, and the tread separation rates in that list indicated by the consumer advisory were twice or three times or more as high as the tread separation in the original recall. So it was a very serious concern on our part.

Mr. RUSH. I would like to ask Mr. Lampe, Mr. Lampe, what was the labor environment for Firestone in 1996?

Mr. LAMPE. Congressman Rush, 1994, July 1994, we had a strike by our United Steelworker employees. At that time they were United Rubber Workers. They came—we hired replacement workers, temporary workers, and in about May 1995 the unionized workers that had been out on strike that had not already come back to work, crossed over. They started coming back, and by 1996 over half of our work force in the Decatur plant was unionized workers that had gone on strike and come back, and less than half were then replacement or temporary workers.

Mr. RUSH. How many workers was that in total? First of all, how many workers originally were at the Decatur plant, normally are at the Decatur plant? How many employees do you have there?

Mr. LAMPE. We have about 2,000 employees today, sir. I think back then it was less. We've increased our production there. It's probably about 1,400, but that's an estimate.

Mr. RUSH. How many workers were affected by the strike, all 2,000?

Mr. LAMPE. At that time the smaller number, yes, sir; all, with the exception of a very small handful, did go out on strike.

Mr. RUSH. So you had how many replacement workers there?

Mr. LAMPE. By 1996, I believe the question was around a little less than half of the work force, probably around 6- or 700.

Mr. RUSH. Have you determined, was there any causal relationship that existed between the replacement workers and the recalled tires that we're discussing today?

Mr. LAMPE. Sir, that's something we've looked at and discussed many times. It will probably be very easy for us to say yeah, that's the problem, and go on with it. We don't think that that was the cause of the problem; however, it's not something we've taken off the table. It's something we continue to look at as a possible factor.

Mr. RUSH. Dr. Bailey, let me ask you another question. Under the circumstances created by the legislation that our agency would share—under the circumstances created by the legislation, your agency would share confidential proprietary information with a foreign government when a recall involved both the U.S. And a foreign government. Once in the possession of the confidential proprietary information, the foreign government could share this information with the public or with its domestic manufacturers. The foreign government could, in the process, damage the economic stability of the U.S. Company whose information was released. If this chain of events were to occur, what recourse with would the U.S. Government have against a foreign government?

Ms. BAILEY. I would need to get legal counsel to determine the answer. But I can tell you we're actively working to obtain greater communication with those foreign governments and companies that have subsidiaries here or companies that have subsidiaries outside of the country.

Mr. TAUZIN. The gentleman's time has expired. I can assure the gentleman that it is on our list of concerns. We will address that and get some legal opinions for the gentleman.

Mr. RUSH. Thank you.

Mr. TAUZIN. Thank the gentleman. I'm going to return the chair to Mr. Upton who will have some final things to do, and then we will dismiss this panel. In closing. Let me thank you again for coming.

Let me point out a couple things for the record. The FARS data are about tire failures. These are single car rollovers that produce accidents and deaths and result from the initiation of the tire failure. So it's important information that was coming into the agency, and it's critical in the future we need to pay attention to it.

Second, Dr. Bailey, you mentioned again today that you did not have the authority to obtain information on claims data warranty and foreign recalls. You testified 2 weeks ago you had the authority to request it, and if you requested it you would get it. What you're seeking now is the automatic transfer of that information to you by legislation; is that correct?

Ms. BAILEY. Yes, sir.

Mr. TAUZIN. Again, let me thank you. Mr. Upton, the Chair.

Mr. UPTON [presiding]. Again I want to thank all of you for your testimony in advance. As you know, we are trying—we have identified a serious problem, and as always when that happens, particularly in my role as Chairman of the Oversight and Investigations Subcommittee, once that is done the next step is then to correct the problem to make sure it does not happen again.

Senator McCain, to his credit, and the Senate, to its credit, have in fact moved legislation that passed yesterday on a unanimous voice vote. That bill at some point will be pending, I hope, on the Senate floor. We are moving as well. The legislation that I introduced last week, H.R. 5164, has been cosponsored by a good number of Republicans and Democrats, many of them on the panel this morning. We are—when Mr. Tauzin returns, they are going to begin the markup stage which will continue into next week. And as you may know, as we are working with the Senate, we're trying to preconference, I guess you could say, a number of items. But there are a number of amendments that would be offered before this subcommittee and before the Telecommunications and Consumer Protection Subcommittee and perhaps then before the full committee when that process resumes later this afternoon and again into next week.

One of the things that I would like to put on the table with you all—so we don't have the language yet or the number of those amendments we'll be seeing in the next couple of days, but that language will likely be shared with your respective groups. And I might ask that we get a quick turnaround in terms of suggestions, constructive changes, how it may work, how it may not work, from each of you as those questions are submitted, whether they be later today, tomorrow, over the weekend, Monday and Tuesday next week. Does that sound like a fair question?

Ms. BAILEY. Yes, sir.

Mr. UPTON. And I know we have questions of the criminal penalties that Mr. Sawyer and Mr. Dingell queried this morning. I know Mr. Markey is working on an SUV standard. I know there are a number of specific amendments that we want to improve the process and not make it linger. And with that, again I thank you for your testimony. And, Dr. Bailey, I think we're asking you to stay a little bit longer, but the others, you are excused. Thank you for being with us this morning.

Our next panelist is the Secretary of Transportation, Mr. Rodney Slater.

I guess we will get started.

Mr. Slater, we appreciate you waiting patiently to finish with our first panel. We're delighted you're here. We're delighted you've taken the opportunity to talk to a number of us in the last couple of weeks as well on a number of fronts. And the format that we are going to proceed on now, the vote is—even though 15 minutes have expired, members will be coming back, and your testimony has been made part of the record in its entirety.

I am going to swear you in and you can give your statement at that point. We will probably do a couple of questions, but not long, because this is likely the last vote on the House floor today, and as soon as we're done, the markup is expected to convene. If you would rise and raise your right hand.

[Witness sworn.]

Mr. UPTON. You are now sworn in. I neglected to ask if you would like to be represented by counsel but I know your answer. The next 5 minutes is yours. Welcome before the committee.

TESTIMONY OF HON. RODNEY E. SLATER, SECRETARY OF TRANSPORTATION

Mr. SLATER. Thank you, Mr. Chairman. I'm looking forward to the dialog between you and members of the committee and Dr. Bailey and myself.

And we thank you for this opportunity to come before you to discuss important legislation to improve the Federal law on motor vehicle safety. Again, I am pleased to be joined by Dr. Bailey and members of our NHTSA and U.S. Department of Transportation team. They are at U.S. the Department of Transportation. We wish to note that we view transportation safety as our top transportation priority. We speak of it as the North Star by which we are guided and willing to be judged, and so we very much appreciate this opportunity to come before you, Mr. Chairman, and members of the committee, because we know that you share the same high standard for transportation safety.

Mr. Chairman, almost 4 years ago, I had the opportunity to come before the Congress and to pledge, if afforded the opportunity to be confirmed, that I and the 100,000 members of the U.S. Department of Transportation would continue to make safety and security the highest priority and a matter of utmost importance at the Department. I am pleased that I've able to work with the Congress and our many stakeholders along with our team to do just that.

Clearly on all fronts, we have the safest transportation system in the Nation's history. Highway death and injury rates, all-time lows. Seatbelt and child safety seat use, all-time highs. Alcohol-related highway fatalities, all-time lows as well.

The same can be said as relates to highway/rail grade crossings, deaths and injuries on our waterways, and also the fact that we have the safest aviation system in the world.

But having said that, any sober and somber reflection on the challenge at hand clearly makes it evident that our system is not safe enough and we cannot rest where we now stand. It must be made safer, and we are committed to working with this Congress to that end.

In that regard as it relates to the specific matter before us, the Firestone recall, we have already reallocated $1.8 million to expedite our own investigation of this matter. We are also moving forward as relates to lessons learned and offering comprehensive legislation to the Congress that will strengthen the powers and the authority of NHTSA to ensure that nothing like this happens again. In this regard, we appreciate the action recently by the Senate Commerce Committee as relates to Senate bill 3059, and then we also acknowledge our appreciation for the opportunity afforded today by this committee and by you in particular, Mr. Chairman, and other members of the committee as you are poised to shortly act on a counterpart measure here in the House, House bill 5164.

In addressing you today, I want to acknowledge that we have been serious and forthright in dealing with the investigation, and Dr. Bailey and her team have done a tremendous job in that regard. As you know, we provided recent updates as relates to information which brought the total to 101 fatalities and more than 400 injuries resulting from the tires in question. Our investigation continues on an urgent basis, and I have again directed the agency to use all means available to conclude the investigation as soon as possible. The challenge before us is to investigate this issue vigorously, to find the facts, and to use the lessons learned again to ensure that this or similar incidences of this nature will not occur.

I would also like to underscore that the Continental and General Tire action also reflects the importance of some of the authority that we request dealing with warranty and claims information, because their action is based on that type of information. And again this is the kind of information that we would like to have to initiate our actions on a more expeditious basis.

In March of this year, Mr. Chairman, we submitted a bill to the Congress to strengthen our legislative framework for our vehicle safety programs. The bill would have increased civil penalties. It would extend the period within which manufacturers must provide no-cost remedy to consumers and require manufacturers to test their products before certifying their compliance. In moving forward in our response to the Firestone investigation, we also reiterated in a more comprehensive proposal those things that were included in our March proposal, but we included some other information as well.

And, Mr. Chairman, Chairman Tauzin, it's a pleasure seeing you as well. The new authority we seek under the more comprehensive proposal that was submitted on September 11 would seek to close certain gaps in our current authority that hinder our ability to detect problems that led to the Firestone recall. Example: Authority to get foreign recall information, clear authority to get warranty and claims information; also again some loopholes that could be fixed, and enhanced authority as it relates to our ability to work with our international partners. We'll probably talk a bit more about this over the course of the discussion. But the bill represents our best thinking of what needs to be done, and we look forward to working with the two of you and your colleagues, all of you, the entire committee, as we deal with the resolution that will come before the House momentarily.

Our bill also addresses a number of concerns raised by what is clearly becoming the globalization of the motor vehicle industry. We believe that the provision dealing with international cooperation included in our bill will provide the kind of early warning devices networks, if you will, that members of this committee have said they favor and we believe is necessary to ensure that issues raised in the Firestone investigation again will not occur.

Our bill would strengthen NHTSA's information gathering powers in several vital respects. It would clarify the agency's authority to obtain information about vehicles and equipment used abroad that is relevant to vehicles and equipment in the United States, and put us on the same statutory footing as it relates to our authority when it comes to obtaining information concerning these vehicles in this country.

Again House Resolution 5164 addresses the need for NHTSA to get timely information about safety recalls and campaigns that occur in foreign countries. We strongly recommend that it not be limited, though, to information about vehicles and equipment that are, quote, "also offered for sale in the United States," close quote. This limitation might excuse a manufacturer if the foreign vehicle or equipment is not identical to that which is sold in this country even though it may share common design and construction elements. So we look forward to working with the committee on this issue.

Also the House proposal addresses the issue of NHTSA tire safety standards. And here NHTSA has already moved ahead on a process for addressing possible changes to these standards, but we look forward to working with the committee to do so as quickly as possible.

Last, I would mention that as relates to our original proposal, we did request additional resources. I mentioned the $1.8 million that we've already reallocated, but we also requested an additional $9 million, and we can talk about the details or the specifics as to how we would use those resources. I would note, though, that the action taken by the Senate to up the authorization by about $18 million, which is consistent with the President's mark, would provide clearly the authorization we would need to get the resources that we would need.

In closing, Mr. Chairman, there are two matters that have come up in discussions that were not a part of our original submission, and I would like to touch on that quickly in concluding my remarks, because I know that the matter came up this morning as well; and, Congressman Upton, you and I talked about it just yesterday. And this deals with the issue of the appropriate penalty, civil and/or criminal, when a company or companies fail to comply with the provisions that will be offered in the bills as we go forward.

As we address the question, let me acknowledge that some have raised concerns that criminal penalties could adversely affect the ability of NHTSA or the Department to investigate and to gather information. And we acknowledge that sentiment. But as I said last week during the Senate committee hearing and I would like to reiterate this now, the administration supports a three-tiered approach to the enforcement of health and safety statutes: administrative civil penalties, which we are seeking; judicially enforced civil penalties, which the NHTSA statute already provides; and then in the case of egregious circumstances, a criminal penalty for those who knowingly and willfully violate the law. And clearly that discussion is underway again and I know we can talk a bit more about that.

Let me also say there are a number of agencies within the U.S. Department of Transportation that have criminal penalty authority, and we can get into the details of that. But I had mentioned that, because we are concerned about having the ability to work collaboratively with industry to gather information, but we do have examples of where even with criminal penalty authority appropriately placed, that we have been able to work with the industry and others to gather the kind of information that we need.

The last thing I would mention, and it deals also with the question of bringing a matter to closure, and it concerns a lack of authority. That is the case with NHTSA as relates to comparable regulatory agencies. And here again I think our discussions may unveil more, but there is one in particular that we're concerned about; and that is, unlike other agencies, NHTSA must try its defects and standards compliance cases de novo in court if a manufacturer refuses to remedy the defect or noncompliance. The law should be changed, we believe, to allow the agency to seek enforcement of its orders with the burden being placed on the manufacturer to show that the action ordered by the agency is unwarranted. The point to be made is that we will do a thorough investigation, move forward on an order, but if that order is challenged and we go to court, then we have to try the matter over again. This is not the case with other regulatory agencies, and we would ask if the committee would consider this.

In summary, again we have worked very closely together. Our desire is to increase the no-charge remedy period of tires from 3 to 5 years, and vehicles from 8 to 10; to raise the maximum penalty, actually to remove the ceiling on it, and we can discuss that question; to require manufacturers to test products before certifying them; to require used car dealers and school bus operators to fix recalls before selling or operating the vehicles in question.

In September, we reiterated these points but we also then added the final four points that I would like to make, and that is a request for authority to get foreign recall information, clear authority to get warranty and claims information and again the Continental case speaks to that point as well as the Firestone case. Also, enhance our ability to work internationally with foreign governments. And finally, the provision deals with fixing certain loopholes, and just one example would be requiring equipment manufacturers such as brake manufacturers to report defects to us.

Mr. Chairman, members of the committee, again we appreciate the opportunity to come before you. This is a serious matter. We take it seriously. We appreciate this occasion to work with the committee and your colleagues across the Congress to ensure that before we leave we have addressed this issue appropriately before the American people.

[The prepared statement of Hon. Rodney E. Slater follows:]

PREPARED STATEMENT OF HON. RODNEY E. SLATER, SECRETARY, UNITED STATES DEPARTMENT OF TRANSPORTATION

Mr. Chairman and Members of the Committee: Thank you for holding this hearing on legislation to improve the federal law on motor vehicle safety. To begin, I want to emphasize the importance of safety to the Department of Transportation. It is our top transportation priority. It is the North Star by which we are guided and willing to be judged. I want to commend you for your leadership on this issue, Mr. Chairman, and that of other committee members.

Mr. Chairman, almost four years ago when I began my service as Secretary of Transportation, I pledged that I would continue to make safety and security of the highest importance. I promised to strive to raise our current levels of safety to even greater heights, and I believe that we are accomplishing this goal on many key fronts: aviation, maritime, highway, transit, and rail. In the Clinton-Gore Administration, we have worked in partnership in a collaborative way across the transportation spectrum to achieve specific and measurable safety goals—with the States, industry, labor and management, local communities, safety advocates, and individual citizens—and the results speak for themselves.

- Highway death and injury rates have fallen to all-time lows.
- Seat belt and child safety seat use rates are at all-time highs.
- Alcohol-related highway fatalities are lower than ever before.

On the whole, we have the safest transportation system in the history of the United States. But any careful evaluation shows us that its safety can still be improved. We have a challenge before us. We must work together to meet it.

In addressing you today, I want to acknowledge the outstanding effort that NHTSA, under the leadership of its Administrator, Dr. Sue Bailey, is making to address the investigation and recall of Firestone ATX, ATX II, and Wilderness AT tires. The investigation is continuing on an urgent basis. I have directed the agency to use every means available to conclude the investigation as soon as possible. The challenge before us is to investigate vigorously, find the facts, and use the lessons we learn to avoid such incidents in the future.

Mr. Chairman, the Department has taken the initiative this year to strengthen the legislative framework for our vehicle safety programs. In March of this year we submitted a bill to Congress to increase civil penalties for defective and noncomplying products, extend the period within which the manufacturers must provide a remedy at no cost to consumers, and require manufacturers to test their products as a basis for their certification of compliance.

As the Firestone investigation unfolded, we again took the initiative, by submitting further comprehensive legislation on September 11 that would fix the gaps in our current authority that hindered our ability to detect the problems that led to the Firestone recall. This bill represents our best thinking on what needs to be done and I encourage you to consider incorporating its provisions into H.R. 5164, the bill introduced by Chairman Upton with bipartisan committee support, and with your sponsorship, Mr. Chairman. We ask you and the Congress to join with us, in a bipartisan effort, to enact effective legislation before this Congress goes out of session. We firmly believe that all representatives of our safety-conscious industries will join us in supporting this important effort.

Our bill addresses a number of the concerns raised by what is clearly the globalization of the motor vehicle industry. We believe that the provision on international cooperation included in our bill would provide the kind of early warning network that members of the committee have said they favor, and is necessary to ensure that the issues raised in the Firestone investigation do not recur. The provision would cover not only information about safety defects, but would include a great deal of other vehicle safety information as well.

Our bill would strengthen NHTSA's information-gathering powers in vital respects. It would clarify the agency's authority to obtain information about foreign information relevant to vehicles and equipment in the United States and put it on the same statutory footing as its authority to obtain information concerning vehicles in this country. It would affirm NHTSA's information-gathering authority in other respects, and would require manufacturers to review information about crashes that may indicate a defect and advise DOT if there is a reason to believe a defect or noncompliance may exist.

H.R. 5164 addresses the need for NHTSA to get timely information about safety recalls and safety campaigns that occur in foreign countries. We strongly recommend that it not be limited to information about vehicles and equipment that are "also offered for sale in the United States," a limitation that might excuse a manufacturer if the foreign vehicle or equipment is not identical to that sold in this country, even though it may share common design or construction elements. This provision would be useful, Mr. Chairman, but we believe it must go further, as our bill does.

H.R. 5164 includes some of the provisions from legislation that the Department submitted earlier, including an increase in civil penalties for a violation, from $1,000 to $5,000 for each vehicle or item or equipment, and an increase in the ceiling for a related series of violations, from $800,000 to $4,000,000. It would also extend the period—from the current three years to five—within which the purchaser of a tire can obtain a no-cost remedy for any defect or noncompliance. These are important provisions and I welcome their inclusion in the bill. I would encourage you to take the further step of removing the ceiling on penalties altogether, as our new bill proposes.

Our bill includes other provisions that we believe should be incorporated into H.R. 5164 as committee deliberations take place. In addition to extending the period for a no-cost remedy for defective and noncomplying tires, we encourage you to consider a similar extension for motor vehicles, from the current 8-year period to 10 years. Today's motor vehicles remain in service much longer than the vehicles of 25 years ago, when the no-cost remedy was first adopted. The period for a no-cost remedy should be extended accordingly.

H.R. 5164 would require tire manufacturers to report information about claims submitted for personal injury and property damage. We believe this would help to avoid the situation that occurred in the Firestone case, but we would also encourage you to expand the requirement to apply to manufacturers of motor vehicles and motor vehicle equipment, as is currently included in our bill.

H.R. 5164 would be enhanced by the inclusion of another provision that we believe is important, particularly in the context of the Firestone investigation. Our March bill included a requirement that manufacturers test their products before certifying them as complying with motor vehicle safety standards. We believe this is a reasonable requirement that would facilitate NHTSA's enforcement program and that would not be burdensome to responsible manufacturers.

H.R. 5164 also addresses the issue of NHTSA's tire safety standards. NHTSA is already in the process of studying and considering possible changes to these standards if they improve safety.

Mr. Chairman, I believe the circumstances call not only for a bill that focuses its efforts on the tire industry, as H.R. 5164 does, but one that provides a comprehensive renovation of NHTSA's safety authority to secure the remedy of defective motor vehicles and motor vehicle equipment.

Finally, Mr. Chairman, we seek additional funding for NHTSA's safety enforcement program. The Office of Defects Investigation (ODI) needs to have additional resources, both in funding and in people, and we ask Congress to provide for these measures. We will immediately reallocate $1.8 million to the Firestone investigation from other NHTSA activities. We are seeking an increased authorization of $9 million to expand ODI's activities, increase public access to ODI's public files, and provide resources for updating our tire safety standards. We submitted a bill in February of this year to increase the authorized levels for NHTSA's motor vehicle safety programs, including ODI, in fiscal year 2001 by $17,640,000. We urge you to consider including a $9 million authorization for NHTSA in the bill now before the committee.

Mr. Chairman, I pledge that as long as I am Secretary, we will do everything in our power to use the new authority we seek, and our existing authority, vigorously. The Department of Transportation is made up of 100,000 visionary and vigilant employees, and I can think of no clearer case in which this message must be heard: we must look to the future and guard against any repetition of tragedies caused by defective vehicles or equipment to the American people.

Mr. Chairman, this concludes my testimony. Dr. Bailey and I will be glad to answer your questions.

Mr. TAUZIN. Mr. Secretary, let me personally thank you for coming today. It is important that America sees how seriously the Department of Transportation takes its responsibility here and, as I told you personally, NHTSA has been one of my favorite agencies personally. It's saved a lot of lives over the years. And if it has any failings in this recent incident, we want to correct it and make sure it never happens again.

That is the purpose of our very critical questions. We should all have that sort of capacity to look at ourselves critically and see where we're missing something that we can improve. And that is true of our legislation. I've said publicly we need to accept our responsibility as legislators. The laws aren't adequate here. And we need to give America a better set of laws, and your agency probably needs to give them a better set of regulations.

To that end, let me ask something of you. We are going to in just a minute end this hearing process and take a recess, and then reconvene as a committee to begin the process of considering the legislation, the ideas that you and others have presented to us in the Upton bill. I have announced to all the members that we will take only opening statements today and a few noncontroversial amendments perhaps, and then we will recess until next Wednesday to give all of us a chance to interact: Chairman Bliley's staff, our staffs, the staffs of the minority, and hopefully designated staffers, if you and Dr. Bailey can do so, to work with us in a collaborative fashion. We are obviously looking for truly a bipartisan and an American solution to this problem and we need all of your help as we need the help of all the members here.

So that by Wednesday next, we would appreciate if in that interactive process we could have some good discussions organized through our staffs and Chairman Bliley's staffs with you to make sure that we have all the relevant information, the proper language, the right drafts of the very technical amendments that ought to go on this bill.

We begin action today as much as a demonstration as anything else that we will take this matter up and move it. We have 3 weeks to do it in. And by taking it up today, putting it on the table before the committee, it puts everybody on notice to get busy. We've got just 6 or 7 days to put this bill in good shape and move it to the full committee. Chairman Bliley is committed to work with us in that effort and to hopefully take it up to the full committee. Both Mr. Upton and I have discussed with Mr. McCain his legislation. We're going to try to get the two bills as close as possible so that we can get a compromise House and Senate version together. And then we will ask you to do the final, most important thing, and that is to prevail upon the White House for a signature before we leave here.

Again, Secretary Slater, we thank you for your appearance today, and again we appreciate the seriousness with which the Department of Transportation is approaching this matter and hopefully will help us find the right solutions as we go forward. Thank you very much.

Mr. ENGEL. Mr. Chairman.

Mr. TAUZIN. Yes.

Mr. ENGEL. I would just like to ask the Secretary—I listened to your testimony, I certainly agree with everything you've said. And the bill before us, I certainly agree with that bill as well. It seems to me that you're proposing something much more comprehensive than the bill before us, and in light of what the chairman said—and I couldn't agree with him more, with the week that we have perhaps to get things together. I just would like to understand up until now what has been the interaction between your agency and the legislature, because it seems what you're proposing is much more comprehensive than what we have. And while I certainly have no objection to what we're doing, I think it's a positive step forward, I would like to see something much more comprehensive come out of this along the lines that you've mentioned.

Mr. SLATER. Congressman, a very good question. We have been working with the Congress very closely from day one. Now, early on, most of the focus was on what happened when, who knew it, and the investigative process. And that's where most of the focus was. But during that time, internally we were also looking at our particular needs as a Department, as an agency, and we reflected on the fact that in March of this year we had presented a proposal designed to actually strengthen our agency in much the same way that we are doing now; but with the Firestone recall, certain other matters were disclosed to us.

We recognize some of our limitations, especially as it relates to foreign recalls and having manufacturers understand that there is a responsibility to provide that information to us. There is not that authority in the current law. And so we started to work probably a little earlier maybe with the Senate on that question, because last week the Senate was taking up the matter and looking at legislation for going forward. But even as we started to work with the Senate, we started to work with the House, and now that we have concluded that work with the Senate, clearly we are focused more on the specifics of our work with the House. The bill that is currently before the committee, though it has been altered a bit of late, focuses primarily on just the tire question. Ours is more comprehensive than that. You've heard me mention used car dealers and school buses and manufacturers to a greater extent. And at the end of the day, I think our continued cooperative and collaborative working relationship will get us the kind of comprehensive bill that I think we would all want.

Mr. TAUZIN. Thank you, Mr. Secretary. Let me point out to my friend that Mr. Upton's bill was filed even before the Senate bill was filed. It represented a knowledge of the facts and potential solutions at that time. Since that time, Mr. Upton in the meeting with staff and Mr. Chairman's staff and others, have identified at least 10 to 15 points where the bill can be improved, and hopefully we hope to have legislative language circulated between members which will indeed make it a more comprehensive bill. And the contributions of the Secretary and his staff has not only been requested today, but I know will be part of that process.

Mr. ENGEL. Let me just say, Mr. Chairman, I think that it's very good news because I don't think there is any controversy here. I think there are things that need to be done, and the more comprehensive we are the better. I think that dealing with the tire industry is fine, but I think we need to go beyond that, along the lines the Secretary has proposed.

Mr. TAUZIN. The only caveat I make is that we have to get this bill done before we leave. And we are not going to complicate it with controversial matters that may bog it down, because this is too critical for American safety. I hope the gentleman will work with us in that regard.

Mr. ENGEL. Yes. I would like to say I think there is enough on which we can all agree that would not be controversial, that we could pass something more comprehensive.

Mr. TAUZIN. The gentleman is correct. Again I thank you, Mr. Secretary. We appreciate your testimony and your continued assistance in this matter.

Mr. Luther.

Mr. LUTHER. Mr. Chairman, thank you. I appreciate your point. If I can just add to the point that was made. I think one thing in your consideration, I think one thing that probably troubles every member of the committee, is how we can still have a situation where people are out driving with those tires and having their families being subjected to that kind of risk in this country. And so anything that we can do in this process to improve the procedures in such a way that when this kind of determination has been made and an admission here of a defect and things are moving forward, anything we can do to make sure that we can get those tires off the road right now for the safety of the people of this country, I think that view would be shared, in any discussions. Anyway, in talking to other members of committee, it's a real frustrating point to think that people are still being put at risk, so I just wanted to add that.

Mr. TAUZIN. I thank the gentleman. In fact, one of the amendments that will be circulated has to do with recall procedures, and it focuses on the question of whether or not when a replacement recall is voluntarily executed and mandated, that if in fact the manufacturer does not have replacements available, that automatically consumers should have the right to seek comparable and appropriate replacements from other manufacturers. We are going to discuss that at the markup that we complete on Wednesday.

The gentleman from California Mr. Cox.

Mr. COX. I just have a quick question with the chairman's indulgence. Secretary Slater, thank you for being here. Did you, prior to my arrival, express a view on the merits of the criminal provision in the McCain proposal?

Mr. SLATER. I did, Congressman. And basically in summary what I said was, while it is true that criminal provisions can sometimes have an adverse effect when it comes to the parties working together to volunteer information, that we have agencies within the Department that actually have criminal penalty authority.

In fact, the way to approach it is really the three-tier approach that we would propose: One, administrative civil penalties, which we request; judicially imposed civil penalties which are currently in law; and then for egregious situations where there is knowing and intentional, willful, violation, then a criminal provision would be appropriate. And we would welcome the opportunity to work with the Congress to properly structure that so as to not again adversely impact the very collaborative process that really results in the unearthing of most of the challenges we face.

Mr. UPTON. Would the gentleman yield?

Mr. COX. I would be pleased to yield.

Mr. UPTON. I would like to clarify as well that as I understand that within the Department of Transportation's jurisdiction pipeline safety, some other important areas that you govern, in fact there are criminal sanctions for exactly the same type of malfeasance; is that not correct?

Mr. SLATER. That's correct. Also with the recently established Federal Motor Carrier Safety Administration, there is the provision for criminal penalties, and that was just acted on by the Congress last year.

Mr. UPTON. I thank the gentleman for yielding.

Mr. TAUZIN. If the gentleman would yield once more, I want to point out that that is also one of those 10 to 15 items that we are beginning to circulate, and we will seek your advice and counsel on that. Because in the end, I think we want a provision in that section that creates safe harbor for voluntary reporters of defects. And we want to make that language careful. I believe Mr. Cox wants to ensure we get voluntary reporting of information.

The gentleman, Mr. Cox.

Mr. COX. I thank the chairman for the time. I wanted to clarify that point, particularly in light of the fact it was discussed earlier. I appreciate your going over it again, and I have to agree entirely with the description that you just made of this problem. The teeth that are provided for enforcement by criminal provisions are much to be desired, but the fact is that the criminal liability will sometimes set people within a firm at odds with what we're trying to obtain, which is full disclosure, which is something we have to do very carefully. Have you expressed a preference for entity liability versus individual liability on the criminal side?

Mr. SLATER. We haven't. And over the course of the discussion here, let's just commit to work together on that point.

Mr. COX. It seems to me, Mr. Chairman, that entity liability is easier to deal with because you would hate the prospect of having a manager in a company being confronted with information about safety problems calling in his personal lawyer at that point, saying that in his personal interest he doesn't want to see any of these things.

Mr. TAUZIN. Yes, that's exactly the nature of this debate and the gentleman from Michigan and I have had some conversations about this. He has pledged to work with us as well. Mr. Dingell is recognized.

Mr. DINGELL. Thank you Mr. Chairman. Mr. Slater, in most circumstances, ordinary civil penalties work as an enforcement tool, do they not?

Mr. SLATER. In most cases; that is correct. Actually that is what we rely on most.

Mr. DINGELL. And they generally work?

Mr. SLATER. Yes, definitely.

Mr. DINGELL. In addition to that, the sanctions of going to court and seeking injunctions works very well, too, does it not?

Mr. SLATER. That's correct.

Mr. DINGELL. Now, would you say that criminal sanctions are something that is needed for general enforcement work?

Mr. SLATER. Not for general enforcement work. Clearly it's a result that you seek only when—in limited cases, when you have egregious activity; knowing, willful violation.

Mr. DINGELL. And on serious matters.

Mr. SLATER. Serious matters; that's correct.

Mr. DINGELL. Now, criminal enforcement creates certain problems, does it not; i.e.,the resort of the individual to his protections under the fifth amendment against self-incrimination.

Mr. SLATER. That's correct.

Mr. DINGELL. And it also imposes on anybody who might have reason to feel the criminal sanctions were there, that he would have to use and resort to his rights under the fifth amendment to assure that he was not undertaking risk of criminal prosecution; is that right?

Mr. SLATER. That is the approach that many would take, yes.

Mr. DINGELL. So the practical result of that would be that it would tend to slow down the enforcement by a significant amount because you would then lose the cooperation of persons who were—who might feel that they were under investigation; is that not so?

Mr. SLATER. That's true, and that's why, Congressman, it should be limited again to major issues; knowing, willful activity.

Mr. DINGELL. Okay. And the other thing, of course, would be that immediately if a company or an individual were to feel he would be confronting that, he wouldn't do anything at all to be of assistance simply because of potential for a criminal prosecution of himself or the company; is that right?

Mr. SLATER. That is highly likely, yes.

Mr. DINGELL. It means you then would be dealing with a phalanx of lawyers and a thicket of legal writs; is that right?

Mr. SLATER. Most likely, yes.

Mr. DINGELL. Thank you, Mr. Chairman.

Mr. TAUZIN. The gentleman's time has expired. In fact, if we're going to begin our process, we need to thank you, Mr. Secretary.

Mr. Markey has one question. He promises me he will limit himself to one question.

Mr. MARKEY. That's, Mr. Secretary, on the early warning provision. Could you tell us about the early warning provision and your support for it, please?

Mr. SLATER. Yes. Clearly if we have access to information dealing with warranty, claims investigations, that sort of thing, then we have the ability to get information much earlier in the process. Actually the Continental tire issue or situation is a case in point. Had we had a firm requirement that they'd provide us that information and were it not voluntary, then, as relates to Firestone, we probably would have gotten that information much earlier, would have started the investigation and would have clearly been on top of this issue a lot earlier in the process.

Mr. MARKEY. So in the bill that you sent us——

Mr. TAUZIN. Mr. Markey, that's No. 2. Go ahead.

Mr. MARKEY. You do believe it should be an affirmative obligation on manufacturers whenever they gain access to information that they have to provide it to you.

Mr. SLATER. That is correct. And then when you have recalls and service complaints in foreign countries, we believe that that information should be provided to us as well.

Mr. MARKEY. Very good. Excellent. Thank you.

Mr. TAUZIN. Thank you, Mr. Markey. I thank you, Mr. Secretary, and the panel is dismissed.

With that, the Chair asks that all members have unanimous consent to submit opening statements and questions for the record. Without objection it is so ordered. The record of this proceeding will stay open 30 days. And by the way, I want to invite any parties who have been tuning in to us who have information or would like to submit something for our record, you certainly have that right to do so within the next 30 days.

We appreciate it very much, Mr. Secretary. The hearing stands adjourned. We will break for about 5 or 10 minutes for the staff to organize a markup session and we'll be back in session in just a minute. Thank you.

[Whereupon, at 1:50 p.m., the subcommittees proceeded to other business.]

[Additional material submitted for the record follows:]

PREPARED STATEMENT OF HON. LOUISE M. SLAUGHTER, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF NEW YORK

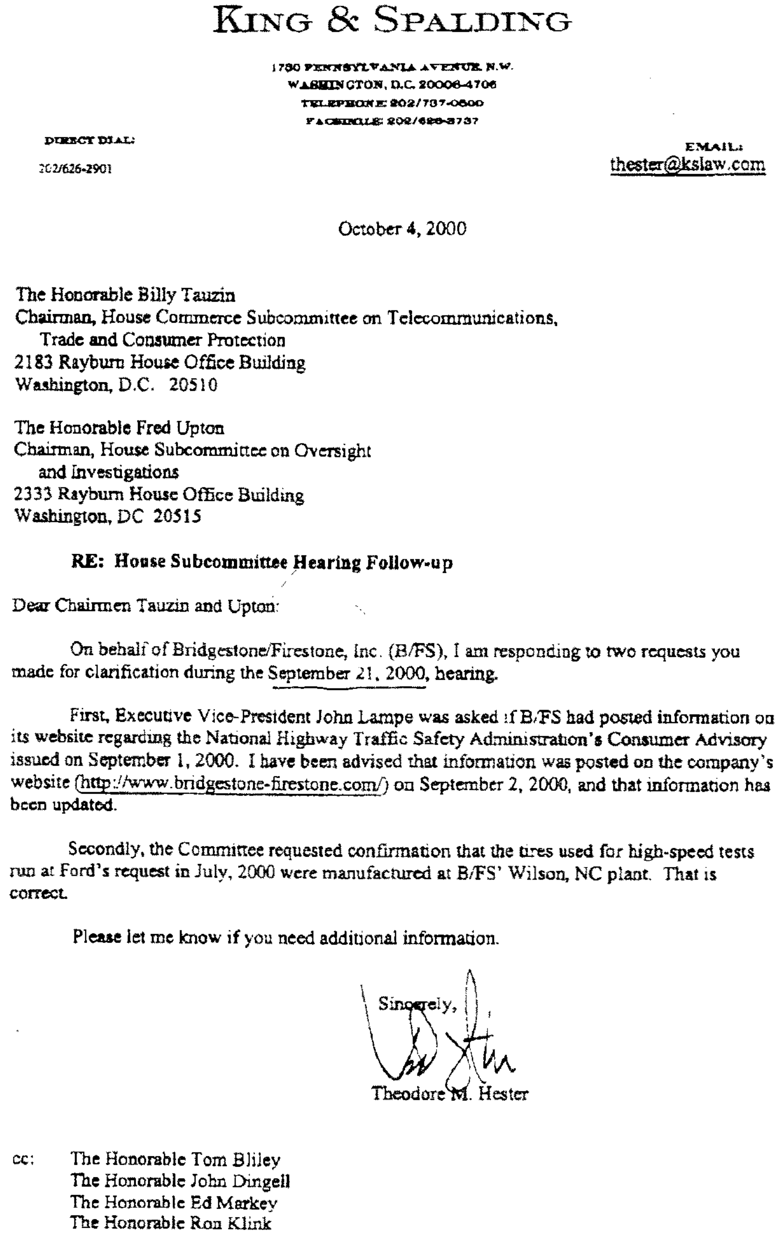
Mr. Chairman, I am grateful for the opportunity to participate in these proceedings. My family has a history with Firestone Tire recalls. In 1978, we had to replace seven out of eight Firestone radial 500 tires. We are grateful to be alive. During the 1978 Firestone tire recall, 8.7 million tires were replaced, at a cost of $150 million, after tax write-offs.

I found it utter foolishness that then President Reagan slashed the budget of the agency charged with oversight of automobile safety by 50 percent within the first three years of his administration and canceled the recommendation of National Highway Traffic Safety Administration (NHTSA) regarding the recall as an example of over regulation. The budget and authority of the NHTSA has never recovered. In the Fiscal Year 1999 Department of Transportation budget, NHTSA's budget is 36% lower than their 1980 budget in real dollars—despite the fact that there are 40% more registered vehicles since 1980, and 21% more registered drivers.

It is unfortunate that it has taken the recent recall of 6.5 million Firestone tires and over 100 deaths to highlight the need for NHTSA to have more authority. Public safety was compromised needlessly.

Therefore, I am pleased to be a cosponsor of H.R. 5164, the Transportation Reporting Enhancement, Accountability and Documentation (TREAD) Act, which is aimed at improving auto and tire safety. The TREAD Act will increase NHTSA's authority to collect information about possibly defective products and expand its budget for investigations. Specifically, the TREAD Act requires auto and tire manufacturers to report any defects on American tires or automobiles sold in foreign countries, requires tire manufacturers to periodically report claims data to NHTSA, increases the time under which tire manufacturers must make free repairs on faulty products, increases penalties for violations, directs NHTSA to update its tire safety standard, and authorizes an additional $500,000 for NHTSA investigators to handle the increased work load.

H.R. 5164 is a small but necessary change to instill public confidence in NHTSA's ability to ensure public safety. I thank you for this opportunity to express my support for consumer safety and look forward to working with this committee in passing the TREAD Act.



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October 4, 2000

The Honorable Billy Tauzin
Chairman, House Commerce Subcommittee on Telecommunications,
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2183 Rayburn House Office Building
Washington, D.C. 20510

The Honorable Fred Upton
Chairman, House Subcommittee on Oversight
and Investigations
2333 Rayburn House Office Building
Washington, DC 20515

RE: House Subcommittee Hearing Follow-up

Dear Chairmen Tauzin and Upton:

On behalf of Bridgestone/Firestone, Inc. (B/FS), I am responding to two requests you made for clarification during the September 21, 2000, hearing.

First, Executive Vice-President John Lampe was asked if B/FS had posted information on its website regarding the National Highway Traffic Safety Administration's Consumer Advisory issued on September 1, 2000. I have been advised that information was posted on the company's website (http://www.bridgestone-firestone.com/) on September 2, 2000, and that information has been updated.

Secondly, the Committee requested confirmation that the tires used for high-speed tests run at Ford's request in July, 2000 were manufactured at B/FS' Wilson, NC plant. That is correct.

Please let me know if you need additional information.

Sincerely,

Theodore M. Hester

cc: The Honorable Tom Bliley
The Honorable John Dingell
The Honorable Ed Markey
The Honorable Ron Klink

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The Honorable Fred Upton
Chairman, Subcommittee on Oversight and Investigations
Committee on Commerce
United States House of Representatives
2125 Rayburn House Office Building
Washington, D.C. 20515-6115

Dear Chairmen Tauzin and Upton:

Enclosed please find 29 CD-ROMS that contain documents which Ford Motor Company ("Ford") has produced to the National Highway Traffic Safety Administration ("NHTSA"). Ford produced these documents in connection with NHTSA's investigation of certain ATX, ATXII and Wilderness AT tires manufactured by Bridgestone/Firestone, Inc. ("Firestone"), which were sold as original equipment on certain Ford vehicles.

The enclosed CD-ROMS contain all of the documents that Ford has produced to NHTSA as of October 1, 2000, with the exception of some incidental correspondence, six CD-ROMs containing the documents known as the "Explorer Collection," and sixteen boxes of documents that were submitted to NHTSA on September 18, 2000. On September 15, 2000, Ford also produced those sixteen boxes of documents to the Subcommittee on Telecommunications, Trade and Consumer Protection and the Subcommittee on Oversight and Investigations ("Subcommittees"). Therefore, the Subcommittees have hard copies of the documents that Ford produced to NHTSA prior to October 1, 2000, but which have not been included on the CD-ROMS. Moreover, Ford has already produced to the Subcommittees the six CD-ROMS that contain the Explorer Collection documents.

Thus, the information produced to NHTSA represents the largest universe of relevant documents that Ford has produced regarding this subject. These CD-ROMS contain over 350,000 pages of documents. The documents that the Subcommittees requested, and which Ford previously produced, are a subset of this larger document collection. Because of the broad scope of NHTSA's information requests, these CD-ROMS contain significant numbers of documents that are probably beyond the scope of the Subcommittees' interest. Nevertheless, in the spirit of full cooperation that Ford pledged in connection with the Subcommittees' inquiries, my client wished to make all of these documents available to your members.

Ford is also providing these CD-ROMS to the other congressional committees that have examined the Firestone tire recall. Therefore, as of October 1, 2000, NHTSA and the various congressional committees possess the same document collection. Ford has produced additional documents to NHTSA since October 1, 2000 and anticipates that it will continue to do so as they are collected from Ford's operations worldwide. Indeed, my client anticipates that these future productions will generate tens of thousands -- if not hundreds of thousands -- of additional documents responsive to NHTSA's requests. If the Subcommittees would like those materials, please notify me in writing and Ford will be pleased to accommodate your request.

I have also enclosed for your review two settlement agreements that were inadvertently omitted from Ford's production of similar settlement agreements on September 15, 2000. Furthermore, I would like to notify the Subcommittees that the documents contained on these CD-ROMS are responsive to the oral requests for information that were directed to Ford's President and Chief Executive Officer, Jac Nasser, and its Vice President for Environmental and Safety Engineering, Helen Petrauskas, by individual members during your hearings on September 6, 2000, and September 21, 2000, respectively.

Specifically, I have enclosed a letter setting forth Ford's position on NHTSA's proposed rollover ratings and prevention initiative. The letter is responsive to Congressman Markey's request that Ford submit a written statement of its position on the proposed rollover ratings system. Similarly, these documents respond to Congressman Stupak's request for the information and data that prompted Ford to commence owner satisfaction programs relating to the Firestone tires for customers in East Asian, Middle Eastern and South American markets. Thus, with this production, Ford has completed its response to the Subcommittees' previous document and information requests pertaining to the Firestone tire recall.

Because many of these documents – such as specifications, release packages, and testing documents – contain proprietary information of the Ford Motor Company, we ask that they be treated as confidential. Indeed, my client submitted many of these same documents to NHTSA requesting that they be given confidential treatment. We ask that the Subcommittees afford these documents similar confidential protection. Should the Subcommittees wish to publicly release any of these confidential documents, Ford respectfully requests reasonable notice and the opportunity to object to such a release.

I would also like to take this opportunity to clarify several items in the testimony of Ms. Petrauskas at the hearing on September 21, 2000. First, on the second page of her written statement, Ms. Petrauskas described test procedure ES-XU5A-1508-AA, which is a high speed laboratory rig test for tires. The test's unique feature, in contrast to the procedures required by relevant SAE requirements, is that testing must be conducted at the air pressure levels recommended to the customer. Ms. Petrauskas explained in her statement that the tires that were subject to the Firestone recall were tested in accordance with this procedure. Although the tires subject to the recall were tested at the Arizona Proving Grounds, a review of Ford's records subsequent to the hearing revealed that the ES-XU5A-1508-AA test procedure was not adopted until April of 1998.

Second, during the hearing, Ms. Petrauskas answered several questions pertaining to reports of tread separations involving Lincoln Navigators equipped with Continental tires. At the time of her testimony, Ms Petrauskas did not recall that one accident involving a Navigator equipped with Continental tires had occurred on August 19, 2000. Early reports about the accident indicated that the probable cause of the accident was an axle failure. However, Ford subsequently confirmed that the police report on the accident indicates that the tread on the right rear tire allegedly separated.

Third, in response to a member's question, Ms. Petrauskas testified that 25 lawsuits had been filed against Ford alleging tread separations on the subject Firestone tires. This answer is correct for the period ending in 1999. In the aftermath of the Firestone recall, however, that number has – as one would expect – grown substantially. As of October 10, 2000, Ford had been named as a defendant in 154 such lawsuits.

Should the Subcommittees have any questions regarding these documents or this matter generally, please contact me at your earliest convenience.

Very truly yours,

K. Lee Blalack, II

K. Lee Blalack, II
for O'MELVENY & MYERS LLP

Enclosures

The Honorable Thomas Bliley (via hand delivery w/o enclosure)
    Chairman, Committee on Commerce
The Honorable John D. Dingell (via hand delivery w/o enclosure)
    Ranking Member, Committee on Commerce
The Honorable Edward J. Markey (via hand delivery w/o enclosure)
    Ranking Member, Subcommittee on
    Telecommunications, Trade and Consumer Protection
The Honorable Ron Klink (via hand delivery w/o enclosure)
    Ranking Member, Subcommittee on
    Oversight and Investigations
Mark Paoletta, Esq. (via hand delivery w/o enclosure)
    Chief Counsel to the Majority, Subcommittee on
    Oversight & Investigations
Reid P.F. Stuntz, Esq. (via hand delivery w/o enclosure)
    Chief Counsel to the Minority, Subcommittee on
    Oversight and Investigations